

EXHIBIT 36

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN, an individual,

Plaintiff

v.

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF,
an individual, EMILY SYLVAN KIM, an individual, PROSPECT AGENCY, LLC, a New
Jersey limited liability company, ENTANGLED PUBLISHING, LLC, a Delaware limited
liability company, MACMILLAN PUBLISHERS, LLC, a New York limited liability company,
UNIVERSAL CITY STUDIOS, LLC, a Delaware limited liability company

Defendants

**EXPERT REPORT AND DISCLOSURE OF
KATHRYN REISS**

I. PROFESSIONAL BACKGROUND AND EXPERIENCE

1. I, Kathryn Reiss, am an award-winning author of twenty novels for children and young adults. I am also a Full Professor of English and Creative Writing and have taught for thirty-four years at Mills College (now Mills College at Northeastern University) in Oakland California, and before that at the University of Michigan, Ann Arbor, and at Trenton State College in Trenton, New Jersey. Attached as Exhibit 1 is a copy of my curriculum vitae.

2. My novels have been published by mainstream publishers: Harcourt, Scholastic, American Girl, Rosen Windmill. Five of my books are in translation with Mizan Publishing in Jakarta. Five are also audiobooks with Tantor Media and Recorded Books. Three have been optioned for film. A list of my publications can be found on my curriculum vitae.

3. As a writer, I understand how stories are imagined, created, and written by having gone through this process myself—successfully—many times over a career of nearly forty years. And, as a professor of writing, I have taught my students the process of developing ideas, creating characters, and weaving strong plots over my long career in academia. An increasing number of my students have gone on to become published authors—even best-selling novelists on the NY Times bestseller list—adding their own novelsto the body of Young Adult Literature.

4. At the start of each new college semester, I always make it a point to kick off my creative writing courses with a lecture called “What Can We Write? What Can’t We Write? And Who Says?” In this hour-long discussion I delve into where we writers get our ideas and how we develop them into full-fledged plots, and the difference between fairly using the elements of a story that are required by the genre and improperly using someone else’s work.

II. SCOPE OF ASSIGNMENT AND METHODOLOGY.

5. I have been retained in this case to evaluate the similarities between six of the Blue Moon Rising / Masqued manuscripts that I understand were authored by Lynne Freeman and the first four books of the Crave series by Tracy Wolff. Specifically, I have been requested to catalogue what I believe to be the notable similarities in the total concept and feel, theme, plot, characters, pace, and setting of the two bodies of work, and render an opinion as to whether those similarities are qualitatively significant and, if so, whether they reflect genre-specific conventions or tropes, or—as Freeman’s counsel has called it—“scènes à faire” in legal language. I have not previously been retained as an expert witness. My hourly rate for my

assignment in this case is \$200 per hour for time spent reviewing materials and preparing this report, and \$350 per hour for writing the report, and for deposition or trial testimony.

6. To accomplish this assignment, I was provided and read the six drafts of Lynne Freemans' manuscripts and notes to her agent that are identified in Exhibit 2 to this report. I also read the four published novels in Tracy Wolff's CRAVE series: *Crave*, *Crush*, *Covet* and *Court*. I had never read anything by either writer before being asked to work on this case.

7. As I reviewed the manuscripts, both unpublished and published, I took copious notes whenever I came across examples of similarities that went beyond genre convention or trope. I filled up an entire spiral notebook with handwritten notes as I read through both the Crave series and Freeman's material (6 manuscripts from 2010, 2011, 2012, 2013, 2014, 2016 and her notes on worldbuilding, characters, and plans for her trilogy).

8. I then drew on my knowledge and experience as a writer and professor to eliminate similarities which were the result of genre conventions and tropes and narrow down the list of similarities to those which I believe to be notable / qualitatively significant and not standard or stock to the type of young adult stories at issue.

9. Finally, I considered the significance of the differences between the presentation of the story in the various iterations of Freeman's manuscripts and the presentation of the story in the *Crave* series and concluded that those differences do not affect my findings in any meaningful way. This conclusion is based in large part on the well-established concept of mosaic, or patchwork editing, through which authors pull stories apart into their constituent pieces with the goal of putting the same story together in a new way to improve its presentation.

III. BASIC PRINCIPLES OF WRITING AND GENRE NOVEL CONVENTIONS

10. I teach both creative writing and essay writing. I want my students to use their imaginations and know how to conduct research. Their ideas must be conveyed clearly, written expressively, and the work must always be their own.

11. That said, fairy tales, myths, and legends show up in new guises in books and films. Centuries-old stories get told and retold. For instance, the Roman poet Ovid's poem about the Greek god *Pygmalion* (a sculptor who creates a beautiful statue and then falls in love with it) was transformed into George Bernard Shaw's 1913 play by the same name. Shaw's play tells the story of a Cockney flower-seller who is transformed into a grand lady by Professor Henry

Higgins, and then that tale became the beloved musical *My Fair Lady*, which in turn has been reimagined in modern films (*Pretty Woman*, *She's All That*).

12. We are all familiar with Shakespeare's *Romeo and Juliet*, the play about the star-crossed lovers whose warring families forbid their love, and whose lives end tragically. We see echoes of this same story again and again in both literature and film—from the musical *West Side Story* to a novel set in modern China about rival gangs (*These Violent Delights*, by Chloe Gong, published in 2020).

13. While I am not a lawyer and am not rendering an opinion on what the law is or should be, my understanding and what I teach my students is that writers are free to retell or build on the work of other authors only where the original texts are in the public domain. They are also free to use elements of story that have become generic tropes used by authors writing in the same genre.

14. That means that anyone reading this report can take Jane Austen's characters in *Pride and Prejudice*, for instance, and make them do new and interesting things because Austen's works are in the public domain. We can therefore have retellings of Austen's novel such as *Pride and Prejudice and Zombies*, by Seth Grahame-Smith, 2009, and recastings such as *Bridget Jones' Diary*, 1996, by Helen Fielding, and spin-offs such as *Death Comes to Pemberley*, 2011, by P.D. James. Writers using works in the public domain can riff on the original story while creating something new by putting their own twist on it.

15. Books in the same genre will often have certain conventions—and tropes-- that will be present across books in the genre, but stories that fit into a genre must still stand as their own individual works.

16. In my course at Mills College, "Writing the Genre Novel," we start by discussing the conventions of various genre novels—that is to say, novels that fit into a certain category of reader expectation, underpinned by identifiable forms. I invite my students to use this metaphor to understand genre: *Think of novels as houses*.

17. Every novel has a recognizable structure of Beginning, Middle, and End just as all houses have a recognizable structure of foundation, walls, roof, windows and doors. But genre novels are even more specific; they have not only the basic structure in common, they have special conventions in common as well. They are like houses with more specific elements in common: A *Victorian* house needs a front porch, decorative moldings, and maybe a tower room;

a *Ranch* house needs an attached garage, rooms on one level, and a living room with a picture window.

18. In this same way, novels in a specific genre will have some things in common. But they will generally NOT have the same plot points, characters, details of setting, and so on. The Victorian houses will have architectural elements in common, but they will generally NOT have the same furniture, the same wallpaper, the same clothes hanging in the closets, or the same food in the fridge.

19. For example, in the popular detective/ murder mystery genre (e.g., Agatha Christie novels and shows like *Columbo*, *Vera*, *Midsomer Murders*, *Death in Paradise*, *Shetland*) there is going to be a dead body. There is going to be a detective trying to solve the murder. There will be a cast of suspects to be interviewed. There will be lies and evasions and red herrings... and quite likely danger for the detective, and often a chase scene—car, boat, plane, person on foot veering off the path in a dense, dark woods—before the end. We know that the intrepid detective will eventually put together all the clues and solve the case. A successful mystery writer is one who pays attention to these conventions of genre while still creating an original and satisfying tale. Indeed, reader and viewer satisfaction to a great extent *depends* on writers following genre conventions. When we watch Hercule Poirot on TV, we gain great satisfaction from knowing, whatever the puzzle, Poirot WILL crack it.

20. In the Romance genre, the heroine meets the hero and is drawn to him, but there is a problem—either from outside (family, society, they are different castes or races, their worlds are determined to keep them apart) or from the couple themselves (he is dangerous, unpredictable, possibly untrustworthy, or he is married!). Scenes of increasing tension move the story forward as the couple grows closer even as the troubles that separate them seem insurmountable (think *Pride and Prejudice*, think *When Harry Met Sally*), until they finally realize they are meant to be together, and all obstacles fall away... or they resolve to triumph over all their problems. The reader has certain expectations, and if these aren't met, there is going to be a lack of reader satisfaction. (Harry and Sally are not going to get killed by a truck when they cross the street.)

21. In another example of genre conventions, we can look at the fantasy/hero quest novel. This is one that takes the main characters into a new and unfamiliar world where they will learn their true calling. They will learn they have powers they never knew about and will need these powers to win the battle between Good and Evil. We see such a tale unfold in the

iconic Star Wars story, where young Luke Skywalker comes to learn who he really is, and what he is meant to do—defeat Darth Vader and the forces of darkness and save the universe. We see the same themes unfold in the world-famous tale of Harry Potter, the young orphan who comes to learn he is really a wizard and must claim his powers and defeat Lord Voldemort and the forces of darkness and save the world.

22. Now let's look at these two series in more detail. Not only do the two series follow broad genre conventions, but they also have further similarities: There is a friendly rogue for a sidekick (Ron Weasley in Harry Potter and Han Solo in Star Wars). There is a wise mentor (Dumbledore in Harry Potter and Obi-wan Kenobi in Star Wars). There are even parallel characters who provide support and friendship for the hero, as well as occasional comic moments (Dobby the House Elf in Harry Potter and R2D2 in Star Wars).

23. Yet no one immersed in the Harry Potter series and the Star Wars series will ever mistake one for the other because the characters inhabit different, highly detailed, expertly realized worlds. The backstories, the visuals, the large casts of characters, and the settings are distinct. The magnificently detailed world of Hogwarts cannot be mistaken for the starships of Star Wars. The inner minds of the characters do not match; they have different personalities and different histories. The details unfolding page after page and on the screen take readers and viewers on uniquely satisfying—and very singular—adventures. It might be only literature professors attempting to draw parallels who can see that in fact, at the core, these tales fit into a broad genre. In the specifics, in their particularities, each story is unique. Secondary characters play similar roles in the plot but are placed in wholly different contexts. Unlike Han Solo, Ron Weasley is a member of a closely-knit family, he has many siblings, a penchant for mischief—and he cannot pilot a starship. Ron is not Han Solo—a rebel, scoundrel, and smuggler. While Ron and Han both stand in as best friends to the heroes Harry Potter and Luke Skywalker, one cannot be mistaken for the other. They are different types of characters inhabiting very different worlds.

24. Returning to our House metaphor, we could say both the Star Wars and Harry Potter series are in the Victorian House genre, but with different floorplans, as well as different wallpaper, rugs, and furnishings inside. Different families live in each house. One series will never be mistaken for the other.

25. I'd like to give an example from my own experience: Two of my novels fit into the suspense sub-genre of 'Creepy Dollhouse Novels.' *Time Windows* is the story of 13-year-old Miranda, who moves with her family from NYC to an old house in Massachusetts. Up in the attic of this big old house, she discovers a dollhouse that is a miniature of the house she has just moved into. The dollhouse turns out to hold secrets—and Miranda can look through its little windows and see into the past to witness events as they unfolded in her own new house years ago. My later novel, *Sweet Miss Honeywell's Revenge*, is the story of 12-year-old Zibby, who buys an antique dollhouse only to discover that it is plagued with a whole host of ghosts, and for her own safety she must find a way to lay them to rest.

26. So it was with great interest that I recently read *The Dollhouse*, by Charis Cotter. This middle grade novel, published in 2021, begins when a young girl moves with her mother to a big old house, and up in the attic discovers an antique dollhouse. And there seem to be ghosts...And there's even a train crash (as there is in *Time Windows*).

27. But I had no concerns that my work was plagiarized. Although the opening premise of moving to an old house and finding a dollhouse in the attic echoes *Time Windows*, the main character and supporting characters are nothing alike. The unfolding story is not at all similar. Although there are possible ghosts, they are nothing like the haunts in *Sweet Miss Honeywell's Revenge*. The characters' inner minds are different. The dialogue is completely different. The settings are different. The unfolding plots hold no parallels. There is no pattern of references, no sequence of plot construction, no similar dialogue. Cotter's book and my own contain the suspense genre conventions of Creepy Dollhouse stories: kids find a dollhouse, characters look into the dollhouse and see various things happening, and if there are ghosts, there are secrets from the past to uncover in order to lay the ghosts to rest, and the main characters solve the mystery in the end. Anyone reading Cotter's novel, knowing my own earlier novels, might indeed be struck by a couple of *surface* similarities—but they would never think that this author has based her novel on mine. Despite having a few of the same genre elements, *Charis Cotter has written her very own, very different, dollhouse story*. One is not based on the other.

28. I cannot say the same regarding Freeman's work and the Crave series.

IV. THE CRAVE SERIES SHARES A REMARKABLE NUMBER OF SIMILARITIES WITH FREEMAN'S WORK THAT ARE NOT THE RESULT OF GENRE CONVENTIONS OR TROPES.

29. Both Lynne Freeman and Tracy Wolff have written books that fit into the popular genre of teen paranormal romance/fantasy. This genre merges the fantasy of the hero-quest with the conventions of romance, and the main characters are teenagers. In this genre we have a world that teems with supernatural creatures. There will be Werewolves, Dragons, Witches, Vampires and the like. Perhaps a bite to the neck. Perhaps a battle to the death. And certainly, there will be a romance against all odds and a young heroine (or hero) destined to battle good and evil while falling in love. These elements are expected genre conventions and tropes.

30. But while Freeman's unpublished manuscripts and Wolff's published novels share these conventions, they also share far more than conventions and tropes.

31. To return to our Victorian house metaphor: Entering Wolff's 'house' after spending time in Freeman's, I found over and over that I recognized the furniture, the draperies, the wallpaper. The piano has just been moved to a different room or positioned differently, but it's essentially the *same* piano. The chintz curtains in the living room are now in the bedroom—but I recognize that they are the *same* chintz curtains. The same food is in the refrigerator—even if sometimes on different shelves.

32. Still, readers might not notice the similarities at first because of the difference in tone and voice between Freeman's manuscripts and Wolff's novels. Developing an original narrative voice is an important aspect of the writing process. When I teach beginning writers, I stress the importance of finding their own voice to tell the story they want to tell. Both Wolff and Freeman narrate their stories in the first-person voice of the heroine, but the first-person voice of Grace, Wolff's heroine, and the dialogue of Grace's friends is laced with profanity and there is a trendy, snazzy vibe different from Freeman's more traditional narrative style written nearly a decade earlier. The narrative voice used by an author does not change the story itself; it is just a way of *telling* that story.

33. Despite the different narrative voices of the two bodies of work, the unfolding tales are remarkably similar. As set forth below in this report, *Crave*, the first book in Wolff's series, largely mirrors Freeman's earlier manuscripts in terms of premise, story, plot devices, dialogue, setting, and placement of action scenes—with the major climactic kidnapping and battle scene

occurring toward the end of the book. And the later books in the Crave Series (*Crush*, *Covet*, *Court*) share further remarkable similarities to Freeman's body of work.

34. My findings also show that Wolff's material across her first four Crave books incorporates many substantially similar central characters, including the heroine (Anna / Grace), the romantic lead (Ash / Jaxon), the childhood best friend (Amanda / Macy), the close male friend (Brendan / Flint), the nemesis female character (Taylor / Lia), the forbidden love interest (Ronan / Hudson), the ultimate villain of the story (vampire prince Julian / vampire king Cyrus), the outspoken, fashion forward character whom the heroine admires (Rachel / Eden), and the nasty daughter of the vampire prince / vampire king who is related to the heroine by blood (Taylor / Isabella). And the stories have remarkably similar inner mind and motivations of characters, dialogue, and even shared character names including The Bloodletter, Marise, Lily, Collin (Colin), Aedan (Aidan), Emma, Gwendolyn (Gwen), Macy (Mason). Indeed, I was overwhelmed by the sheer number of *identical details, unique concepts, copied plot elements, parallel characters, and even contextualized lines of dialogue*. These similarities, detailed below, are not rooted in genre conventions.

**A. QUALITATIVE SIMILARITIES BETWEEN THE FREEMAN
MANUSCRIPTS AND CRAVE (book #1 in the CRAVE series)**

35. The premise and main plot of Freeman's first drafts of her book are the same as the main plot of *Crave* (book 1). In both authors' works we have:

- a) A girl approximately seventeen years old from San Diego comes to Anchorage, Alaska after an accident kills her family members. Her last words with her family members were in a fight and she feels guilty. She suffers panic and anxiety from the trauma.
- b) She now lives with the only two family members she believes she has left, and they are both supernatural witches, which she doesn't know because she's been kept ignorant of the supernatural world by her family.
- c) The heroine meets the romantic lead, a dangerous guy with secrets of his own, who is also suffering from the loss of his murdered older brother, and he feels responsible. He and the heroine heal one another through their love, and he believes they have a special bond, that they are mates, and that she is the only one for him.

- d) The heroine discovers that the romantic lead is a dangerous supernatural being who is trying to stop a supernatural war among the factions of beings, and she is irresistibly drawn to him and the dangerousness of him in particular.
- e) The heroine is kidnapped by a vampire who wants to bring back their dead mate and needs the heroine in order to do so. This vampire believes the heroine will become the *reincarnation* of his dead mate / will be used in a spell to *resurrect* her dead mate. This vampire wants to use the heroine as an act of vengeance against the person believed to be responsible for their mate's death.
- f) The heroine turns out to be a unique supernatural being made of magic who is a protector of supernaturals, humans, and other creatures. She is in danger because of what she is, and others are seeking to destroy her so that she can't be used in the war.
- g) At the end of the book, the Bloodletter character turns into a raven / winged creature and flies away.

The Heroine and Her Situation:

36. The similarities in these storylines are remarkable, particularly when we begin to look at more specific details. I begin this analysis with THE HEROINE and her SITUATION:

- a) Freeman's heroine Anna (in some drafts called Mia or Ella—but they are all the same character) lives in Anchorage, Alaska, having moved there from San Diego after the deaths of her father and grandparents. She lives with her mother and aunt who both turn out to be supernatural witches, though she doesn't know it (in latter edited versions of Freeman's material she plays with the idea of the heroine knowing). She has no other family. She believes she is human—but readers will later learn, as she herself learns, that her father was a werewolf and her mother a witch. She attends public high school. Her friends and two teachers are supernatural beings, but Anna doesn't know that either—at first. She has been kept ignorant of the supernatural world by her mother and aunt in order to keep her safe. Special potions of Tea have been used to bind her powers and hide them, keeping her from accessing her powers to shift into her supernatural form. She often thinks about the deaths of her father and grandparents—though her mother and aunt rarely speak of them. She has never gotten over the loss and suffers panic attacks and anxiety as a result.

- b) And then we have the CRAVE series, which begins with Wolff's heroine, Grace, arriving in Anchorage, Alaska from San Diego California after the deaths of her parents. (The city was changed to *Fairbanks*, Alaska in the second and subsequent editions). Grace is the new girl at a remote boarding school and now lives with her uncle (who is the headmaster) and her cousin. They are both supernatural witches, though Grace doesn't know it. She has no other family. She believes she is human—but readers will later learn, as she herself learns, that her father was a witch and her mother was a gargoyle. The students at the boarding school are supernatural beings, but Grace doesn't know that either--at first. She has been kept ignorant of the supernatural world by her parents and uncle in order to keep her safe. Special potions of Tea have been used to bind her powers and hide them, keeping her from accessing her powers to shift into her supernatural form. She often thinks about the deaths of her parents. She has panic attacks and anxiety from the loss.
- c) While Freeman's heroine goes to public school and Wolff's goes to a very different private school, I found it remarkable that Freeman's notes to her agent about her plans for Book 2 describe Katmai, a refuge in Alaska, remote, accessible only by small plane; a magical place where Supernatural beings can meet and where the heroine will go once she knows what she really is. In Wolff's series, the boarding school where Grace comes to live is called Katmere and is a remote refuge full of magic where supernatural beings can meet and live together. The heroine takes a small plane to get there.
- d) Here are some vivid descriptions that are small in terms of plot but add to the depth of character for the heroines, helping shape the readers' understanding of the girls:
- The Heroine calls herself a 'Dork.' (Freeman 2011, 41)¹
 - The Heroine's best girlfriend, who is her cousin, calls her a 'Dork' And the Heroine agrees she is one. (CRAVE, 44)
 - The heroine is a "dork" three pages apart, in the same place in both stories.

¹ Citations that appear in this report starting with "Freeman" or the name of a Crave book reference either a Freeman manuscript, by year and page number, or a book in the Crave series by title and page number.

- Both heroines suffer panic attacks which began after the deaths of their family members. Freeman's manuscripts and Wolff's series detail both the heroines' physical symptoms and their methods of dealing with the panic attacks. (Freeman 2010, 21, 22,78,160, 210, 326, 380, 421, 449, 468; Freeman 2011, 2,30-31; Freeman 2012, 5, 28, 332, 475. Freeman 2014, 316;) (CRAVE, 15, 50-51; COVET, 66, 363)
- Both heroines are in advanced level classes in high school, they quote Shakespeare, they love to read, and they talk about French Philosophers: (Freeman Plot Notes 2008; Freeman 2011, 10, 29, 39, 230, 385, 464; Freeman 2012, 258.) CRAVE, 25, 226, 247; CRAVE 92, 191, 197,252; COVET, 382, 384.)
- The Heroines think about handsome vampires in the same way:
 - "Mr. Tall, Dark and Bloodthirsty," (Freeman 2011, 507)
 - "Mr. Tall, Dark and Surly," (CRAVE, 32, 35).

37. The similarities in the language identified above warrant a bit of clarification. The familiar phrase "tall, dark, and handsome" is one that any writer might use. HOWEVER the riff on this phrase--and the addition of "Mr."—in both Freeman's and Wolff's novels made me sit up and take notice. Not only is the *phrasing* similar, the *context* is identical:

- a) Freeman's teenage heroine (who believes herself to be human but is actually a powerful magical creature destined to save the world) describes a handsome vampire as: *Mr. Tall Dark and Bloodthirsty*. (Freeman 2011, 507)
- b) Wolff's teenage heroine (who believes herself to be human but is actually a powerful magical creature destined to save the world) describes a handsome vampire (who will be her love interest) as: *Mr. Tall Dark and Surly*. (CRAVE, 32, 35).

38. Even the unique detail of unusual décor that Freeman invented of *gleaming gemstones on the walls* (Freeman 2010, 333; Freeman 2011, 210) is mirrored throughout Wolff's books in several places. (CRAVE, 238-239, 436; CRUSH, 91; COVET, 172,173)

- a) "Her art decorated the walls as it did in so many rooms throughout our house—splashes of color made from gemstones, sparkling and catching the light..." (Freeman 2011, 210)

b) “The walls are made entirely of different-colored stones...they gleam red and blue and green even in the faint light...what school...has the money to embed gemstones in the walls” (CRAVE 238-239)

39. **Arrival in Snow / Setting:** Early in both Freeman’s manuscripts and in Wolff’s CRAVE, there is a scene of the heroine traveling through the snow.

- Freeman’s heroine is arriving home after school on a motorcycle, hanging on behind the driver, her arms wrapped tightly. They drive along the snowy road lined with trees. The wind is chill and biting. They come to the huge manor, described as a fortress, where the heroine lives. It is described as massive and rich, completely isolated, enclosed by large stone walls. There are huge glass windows. A security code must be tapped in before the massive gates open. (Freeman 2010, 43—but also described this way in manuscripts 2011, 2012, 2013, 2014).
- And then in CRAVE we have Grace riding on a snowmobile, hanging on behind the driver, her arms wrapped tightly. The road is long and winding and covered in snow. They ride through a copse of trees: The wind is biting; the heroine is freezing cold. They come to a huge castle, completely isolated, surrounded by a stone wall. It has elegant arches and ornate windows. A security code must be tapped in before the grand security gate opens. (CRAVE, 12-14)
- Freeman’s romantic lead and his clan live an “Old-World European chateau” (Freeman 2013, 322). Wolff’s romantic lead and all the students live in at the school, which is a gothic castle (CRAVE, 13)
- Freeman’s heroine reflects that living in Alaska is like living on the moon: “I’ve always felt that winter in Alaska must be like living on the moon...” (Freeman 2011, 274); Wolff similarly has Grace declare: “...Alaska feels like the moon...” (Crave, 34).

40. Wolff sets her heroine up as the same character as Freeman’s heroine. Both characters came from San Diego and moved to Alaska—for the same reasons (deaths of family members). They feel the same way about Alaska, and they travel through the snow in similar fashion, arriving at a similarly described destination.

The Romantic Lead:

41. There are also remarkable similarities between the romantic lead characters.

The parallels continue:

42. When Freeman's heroine arrives at school, she meets the handsome and compelling new boy—who becomes the romantic lead, Ash (in later drafts called Roman).

- Anna feels an immediate attraction to Ash. She finds him handsome and compelling, with “full lips and sculpted features with large, brilliant white teeth; something almost feral and predatory; sinuous; ...radiated vibrant good health with rosy cheeks, red lips and sun-kissed skin. The overall picture was one of dangerous, irresistible beauty. His physical beauty was so compelling that I was overcome. Our eyes locked, his a most unusual shade of what I could only describe as amber now that I was up close, with my own astonished gray. Amber eyes rimmed in black.” (Freeman 2010, 13)
- Compare this to how Wolff's heroine Grace arrives at her new boarding school and immediately meets the handsome and compelling Jaxon—who becomes the romantic lead. Wolff uses the same details of appearance as Freeman does to describe the romantic lead: body that is long and lean, with hard biceps, dark hair and hypnotic eyes: “Skyscraper cheekbones. Full red lips. A jaw so sharp it could cut stone. Smooth, alabaster skin. And his eyes . . . a bottomless obsidian.” (CRAVE 21, 22)
- At first meeting both boys are wearing black jeans and a T shirt. (Freeman 2011, 20; CRAVE, 22). They wear *designer* clothing.
- And they are described the same way:
 - “Beautiful dark angel, quintessential bad boy” (Freeman 2011, 32, 202)
 - “Looks like a fallen-angel with a bad-boy vibe” (CRAVE, 30).
- Both heroines find the boys to be mysterious, dangerous, and alluring:
 - “I realized that it was a bit twisted to feel that way about him, to be drawn to him even though he frightened me—maybe to be drawn to him because he frightened me—but I was. Something inside of me responded to the dangerous edge in him and liked it.” (Freeman 2011, 127.)

- “Instead, I stay where I am. Not because Jaxon is blocking my way—which he is—but because everything inside me is responding to everything inside him. Even the danger. Especially the danger...” (CRAVE 127.)
- Freeman’s language is mirrored in further descriptions of the boys’ allure:
 - “I knew he was dangerous on some level yet I found him intriguing and maybe even exciting at the same time.... He captivated me in every way, he was just so appealing. And terrifying.” Freeman 2011, 127, 253.
 - “Because the longer I stand here, the more I realize this guy is as terrifying as he is intriguing.... this boy who frustrates, terrifies, and excites me all at the same time.” (CRAVE 25, 30)

43. Freeman’s heroine Anna discovers that the boy has secrets and is suffering from loss as well; his older brother has died. Similarly, Wolff’s heroine Grace discovers that Jaxon has secrets and is suffering from loss as well; his older brother has died.

- Both romantic leads feel responsible for the deaths. They are weighed down by guilt.
- In Freeman’s book *Ash*’s older brother was 19, and in the CRAVE series Jaxon’s older brother *looks* about 19. (Freeman 2010, 97-98; 2011, 125-127; COVET, 448.)

44. Ash tries to resist his attraction to Anna because he believes that being with him will be dangerous for her. We later learn that he is a werewolf who is trying to stop a war between races of supernatural beings. He doesn’t want Anna to be in danger due to her association with him and his world. Similarly, Jaxon tries to resist his attraction to Grace because he believes that being with him will be dangerous for her. It is later revealed that he is a vampire, and he is trying to stop a war between races of supernatural beings. He doesn’t want Grace to be in danger due to her association with him and his world.

45. Both heroines find the boys *compelling*, *overwhelming*, and *different*:

- a) “His physical beauty was so compelling that I was overcome.” (Freeman 2010, 13; Freeman 2011, 16). “There’s something different about him . . . a certain presence.” (Freeman 2011, 82).

b) “Still, there’s something more to him, something different and powerful and overwhelming.” (CRAVE, 21)

46. When both heroines first meet the romantic leads, they lock eyes. Freeman describes Anna’s feelings like this:

a) “It was in this moment that I felt an instant sense of awareness—a tingling bolt of electricity —my lips parted and I gasped involuntarily. He grinned a wicked grin and winked at me as if he knew exactly what effect he had on me and any other girl for that matter.” (Freeman 2011, 16)

b) And Wolff describes Grace’s feelings like this: “And now he’s grinning, one corner of his mouth turning up in a crooked little smile that I feel in every single cell. Which only makes it worse, because that smirk says he knows exactly what kind of effect he’s having on me. And, worse, that he’s enjoying it.” (CRAVE, 22)

47. The boys are described as *smelling* the same way: of citrus and waterfalls (Freeman 2011, 256, 460) or oranges and fresh water (CRAVE, 435; CRUSH, 10).

48. When the heroine is in his arms, his scent wraps itself around her:

a) “...his warm breath delicious against my ear. His scent wrapped itself around me.” (Freeman 2011, 172-173; Freeman 2010, 136).

b) “...his breath is so warm and soft against my ear...and the orange and dark water scent of him currently wrapping itself around me.” (CRAVE, 141)

The First Kiss:

49. In Freeman’s manuscripts, the heroine first learns about the supernatural world and the romantic lead’s place in it after the triggering event of their first kiss together. During that first kiss, he loses self- control. His eyes glow and he starts to shift with his supernatural powers. The heroine is frightened and wants to run away--but can’t. She sees that his eyes are inhuman and now needs to know the truth. The next day she demands answers and wonders if he’s an alien, a werewolf, or a vampire. It is soon revealed that the romantic lead is a werewolf, and he believes the heroine is his mate and they are “bonded” together. (Freeman 2011, 423-424, 495)

50. In CRAVE the first kiss functions in the same way. Grace learns about the supernatural world and that romantic lead is a vampire, and then during their first kiss, Jaxon

loses self-control. He causes an earthquake by accident with his powers. The heroine is frightened by the quake and this display of supernatural powers and runs from him. He catches her, and she later finds puncture marks on her neck. The next day she demands answers and wonders if he's an alien or a vampire. It is soon revealed that the romantic lead is indeed a vampire—one who believes the heroine is his mate and that they have a "mating bond." (CRAVE, 546, 569).

51. Anna wonders if Ash is an alien (Freeman 2011, 193), while Grace asks if Jaxon is an alien (CRAVE, 260).

52. In both stories the heroines and romantic leads first kiss outdoors under a dazzling night sky—lit with the Northern Lights in Freeman's story (Freeman 2011, 132-36) and lit with a meteor shower in Wolff's (CRAVE, 263-272).

53. Freeman's heroine wonders if the romantic lead's parents will object to their "public display of affection." She melts into him when they kiss. (Freeman 2011, 418, 481).

54. Wolff's heroine, Grace, says she's never been into "PDA" before and the romantic lead has her breaking all the rules. She melts against him when they kiss (CRAVE, 524).

55. As the heroines get to know the romantic leads, the Wolff books continue to echo the Freeman manuscripts in both large and small ways. I noticed that while Wolff uses the same details, they are not always in the same place in her story. She is using the same pieces but placed differently.

56. The parallels continue to unfold in details of characters' inner minds and feelings as well as scenes of unfolding romance and danger. Character, action, and storyline are parallel:

57. So not only are the heroines of Freeman's and Wolff's work parallel characters, so are the romantic leads. They are the same type of boy; they look the same; they dress the same—even to the point that they wear *designer clothing*, they have similar powers and abilities and the need to hide them; they have suffered the same loss of an older brother for which they feel responsible; they are identically drawn to the heroine and yet must hide their enormous supernatural powers from her to keep her safe.

58. Both romantic leads need to bite the heroine to save her from bleeding to death after being attacked. While vampires and werewolves biting people is certainly a genre convention, in both Freeman's and Wolff's works it is explained that these are medicinal bites because saliva

has coagulating properties that speed healing. (Freeman 2010, 323, 429; Freeman 2011, 405-407; 532-533; CRAVE, 319-320).

59. There is a Northern Lights scene with the heroine and romantic lead outside at night in the winter cold. The heroines ‘barely feel’ the cold. The ‘purple’ and ‘green’ colors ‘swirl’ across the night sky. In Freeman’s work the heroine talks about a scientific explanation for the phenomena, while in CRAVE the heroine explains the science behind the colors. Both heroines describe the scene as a ‘light show.’ (Freeman 2013 153-154; CRAVE 438-441.). There is a ‘hungry’ kiss (“a sort of hunger overtakes me,” Freeman 2013, 158) . . . “like he’s starving for me,” CRAVE 439).

60. In Freeman’s work, the heroine and romantic lead have just come from the school dance to view the Northern Lights, and in Wolff’s work, the heroine and romantic lead dance under the Northern Lights. During the heroines’ dances with the romantic leads, they ‘laugh’ during the dance and think about the ‘joy of’ the moment. In Freeman’s work they are ‘suspended in time,’ while in Wolff’s work they are ‘floating.’ (Freeman 2013, 149, CRAVE 440, 441.)

Other Parallel Characters:

61. In addition to the romantic leads, the heroines in both authors’ works have several friends of importance, and Wolff’s characters parallel those from Freeman’s work. There is the best girl friend—in Freeman’s work this character is Amanda, a longtime friend from childhood, and in Wolff’s this character is Macy, Grace’s cousin, whom she has known since childhood. (Amanda is a school cheerleader, and Macy is on the school dance team with “pom poms,” and neither heroine is fond of these activities.)

62. There is also the character of the mean girl / nemesis, who in Freeman’s work is Taylor Vaughn, who turns out to be a supernatural succubus who tries to kill the heroine. Wolff’s parallel character in CRAVE is Lia, who turns out to be a vampire who tries to kill the heroine. These characters play the same parts and fulfill the same roles: Taylor and Lia both drug the heroines. They both are in love with a powerful vampire prince.

63. While these various female characters are very important in the same ways to both Freeman’s and Wolff’s storyline and to their heroines, even more significantly, each heroine also has a best guy friend. Freeman’s ‘best guy friend’ for Anna (Mia/Ella), Brendan, jokes around

with the heroine, calling her silly names. Wolff's character, Flint, jokes around with the heroine, calling her silly names.

64. Notably, both Brendan and Flint are described as being of mixed race, part Black, with warm brown skin, and both are gay—something each has revealed to the heroine but that is not widely known. (Freeman 2011, 100, 104; (CRAVE 35; CRUSH, 369-370, 382, 388)

65. Freeman's romantic lead doesn't like the heroine being with Brendan. He gives Brendan a fixed stare. (Freeman 2011, 164, 166, 182). Wolff's romantic lead doesn't like Grace being with Flint. His eyes are pinned to Flint. (CRAVE, 157, 243)

66. Additionally, and described with more detail later in this report are the parallel characters of the vampire prince in Freeman's body of work and the vampire king in Wolff's, who are both the ultimate villain of the story; the heroine's secondary love interest (who is thought to be evil and will bring an apocalypse), and her aunt in Freeman's story and the uncle in Wolff's (who is a witch, kisses the heroine on top of her head, talks to her about her heritage, and dispenses advice) .

67. These vividly detailed descriptions of the heroines' friends and other characters are notable in that they are decidedly not genre tropes. They contain specifics of appearance, heritage, and behaviors that are remarkably similar or identical, and are used for the same reasons in both bodies of work.

Party Scenes / Spiked Drinks:

68. Both heroines go to parties and imbibe a spiked drink that evening. In Freeman's manuscripts, there is first a Halloween party, where the mean girls are out in full force and the heroine feels uncomfortable and leaves early. Then a bit later in the novel there is a house party, where Freeman's heroine is given a spiked drink, wants to leave early, and later feels nauseous, then vomits, falling into "a fitful sleep." (Freeman 2010, 158; Freeman 2011, 350, 371). In Wolff's CRAVE, the time of year is said to be *near* Halloween ("Halloween wasn't that long ago," CRAVE, 97). Wolff creates a slightly different party scene with Grace feeling uncomfortable, and deciding to leave the party, then being given a spiked drink, (CRAVE, 100-104, 451) feeling nauseous, and vomiting. Finally, she drifts off into a "fitful sleep." (CRAVE 109).

69. In both Freeman's book and in CRAVE the spiked beverages are given to the heroine by the girl who is her nemesis (Taylor in Freeman's work; Lia in CRAVE.)

70. The similarity between Wolff's party scene and Freeman's two party scenes are not "scènes à faire." Unlike the scenes about teens who drink spiked drinks at wild parties which exist in many stories and films, here we have two hapless heroines who believe themselves to be normal human girls but who are actually—unknown to them at this time—powerful supernatural beings. Other people know of this and seek to diminish the heroines and get them out of the way, eventually trying to kill them. They are surrounded by teens who are also powerful supernatural beings, and yet the heroines don't yet know this, either. In both stories a similar female nemesis character spikes the heroine's drink, gives her a cup of it, and tells the heroine she'll like it / hopes she'll like it. Freeman 2013 p. 277; Wolff 100-101. The heroine takes a sip and describes the taste. Freeman 2013 p. 277 (fruity taste); Wolff p. 100-101 (floral taste). The heroine tells the nemesis she has to leave and the nemesis tries to get the heroine to stay. Freeman 2013 p. 277; Wolff p. 104. The nemesis rolls her eyes in this scene and is unpleasant. Freeman 2013 p. 277; Wolff p. 105. When the heroines are nauseated and feeling sick, parallel friends come to their aid. Both heroines drift off into fitful sleep.

71. These scenes and their particular similarities are *used for the same reason* in both Freeman's work and in CRAVE: the heroines are girls in very similar situations who are drugged for the same reason by characters who parallel one another. These party scenes function the same way in both works. The point of the parties, then, in terms of furthering the plot, is to demonstrate early on that the heroine is in danger, and to set up later dramatic action when she will learn of her destiny, come into her own power, and vanquish those who sought to harm her. These are key early scenes in the plotline of both books.

Attack Scene:

72. Another remarkably similar scene between Freeman's work and the first Crave book involves an attack scene, it's cold and there is snow outside. Freeman's heroine is attacked by two vampires. She fights back, and the romantic lead rescues her. In CRAVE, Grace is attacked by two werewolves. She fights back, and the romantic lead rescues her. The similarities in the specifics of those scenes include the following:

- The attackers are not dressed for the freezing cold weather, wearing only jeans and T shirts, and yet, ominously, they don't feel the cold:
 - "two men were dressed in jeans and shirts, no coats..." (Freeman 2011, 519).
 - "Two guys wearing nothing but old-school concert T-shirts, jeans...no jackets..." (CRAVE, 53)
- one is tall and thin, the other is stocky. One has blond hair.
 - "One guy is blond and muscular... the other . . . short, spiky white-blond hair." (Freeman 2011, 519; Freeman 2013, 58, 393)
 - "he's shorter than the first and stockier too. His blond hair was shaved close to his head." (CRAVE, 53)
- Both heroines think their attackers look like 1980's rockers.
 - "retro throw-back to the eighties . . . looks like Billy Idol" . . . Punk rocker throwback in a bad eighties movie." "a dog collar and an earring" (Freeman 2013, 58; Freeman 2014, 48)
 - "...if this castle...comes...with its very own ghosts. Ones who died at an eighties rock concert." "black nose ring right through his septum" (CRAVE, 53).
- One attacker speaks to the heroine in a menacing tone *saying the same thing*:
 - "Well, well, well. Looks like--" (Freeman 2013, 58; 2014, 48)
 - "Well, well, well. Looks like--" (CRAVE, 53)
- One attacker asks the heroine a question, and gets too close:
 - "closing the distance between us..." (Freeman 2013, 59)
 - "walking toward me . . . getting into my personal space" (CRAVE 53-54)
- The heroine is reminded of a movie and is grabbed:
 - "bad eighties movie"... "Billy reaches a hand out and grabs me." (Freeman 2013, 59, 395; Freeman 2014, 48-49)
 - "scene out of every teen movie".... "Marc reaches a hand out and grabs me. (CRAVE 55, 56)
- The stocky attacker restrains the heroine in exactly the same way:

- “pinning me to him, my back to his front.” “I struggle against him...”. “I buck backwards for all I’m worth, head butting him. *Crack!* I’ve hit his nose.” (Freeman 2013, 59-60; Freeman 2014, 49-50)
- “He yanks me hard against him—my back to his front... as I start to struggle in earnest...I slam my head back with as much force as I can, aiming to break his nose.” (CRAVE, 56-57)
- The heroine wants to damage the attacker’s feet:
 - “I raise my knees and slam my feet down, heels first onto the Hulk’s toes.” (Freeman 2013, 60; Freeman 2014, 49)
 - “I think about stomping on his feet, but my Converse aren’t going to do much damage.” (CRAVE, 56)
- The heroine struggles and her mouth bleeds:
 - “My head is yanked backward so hard I bite my tongue. The coppery tang of blood fills my mouth...” (Freeman 2014, 50)
 - “His forearm slams against my mouth. It hurts, has the metallic taste of blood pooling in my mouth.” (CRAVE, 56-57)
- The heroine puts her fists up:
 - “I clench my jaw and crouch forward on the balls of my feet, fists up, ready to take the Hulk on.” (Freeman 2014, 50)
 - “I turn to flee, fists up in an attempt to ward off Quinn...” (CRAVE, 57)

73. What stands out to me here is that the description of action, types of characters, paranormal attributes, clothing styles, and threatening language are all mirrored between Freeman’s manuscripts and Wolff’s CRAVE. The scenes track exactly the same way, and the sequence of specifics do not reflect tropes or a convention of genre. It is a vividly detailed scene appearing *with the same details* in both writers’ works.

Discovering that the Supernatural World is Real:

74. As Freeman’s plot continues to unfold, her heroine witnesses strange and supernatural occurrences she cannot explain. She demands to be told the truth. Anna tells Ash, the romantic lead, that she cannot be in a relationship beset by secrets, and he finally agrees to

meet with her and to tell her the truth. They meet at a bookstore, and the *big reveal* is staggering: This is when the romantic lead reveals that monsters are real, witches, vampires, wolf shifters—all are real. And he is a werewolf. A Sentinel. And, moreover, the Supernatural beings are at war with each other. Right here and now: “A reality where the supernatural was . . . natural.” “The things that go bump in the night . . . All the fairy tales and stories . . . they’re true.” “How could I reconcile school with demons, werewolves and a supernatural war?” “Beings of myth and legend are fighting each other, . . . with Earth as the battlefield.” (Freeman 2011, 230, 236-237, 462)

75. As Wolff’s plot continues to unfold, her heroine witnesses strange and supernatural occurrences she cannot explain. She demands to be told the truth. Similarly she learns from her cousin and uncle, as well as the romantic lead, that the supernatural world is real and there is a war going on between the supernatural beings. “Everything you’d ever heard about the supernatural world was actually real...”. “school is filled with things that go bump in the night:... vampires and dragons are real when we’re in the middle of a giant turf war.” (CRAVE, 342-344).

76. The politics of the supernatural world in each story are similar: Both heroines learn there is an “Order.” (Freeman 2011, 294-300; CRAVE 135, 366) Both heroines learn there is a “Council.” (Freeman 2013, 335; CRAVE, 220). Both heroines learn there is a “Circle.” (Freeman 2016, 69; CRUSH, 220). In both authors’ works the romantic leads’ parents are on the council and central to the governing of the supernatural world.

77. And then when Freeman’s heroine confronts her mother and aunt about the incredible news of the supernatural world, and they talk to her about the danger she is in. “*Why haven’t you told me anything?*” demands the heroine. They explain that they kept her in the dark about the supernatural world because they couldn’t take any risks with her safety since her dad was killed, and they moved to Alaska because that seemed like a safe place. (Freeman 2013, 343, 344-345)

78. CRAVE again parallels Freeman’s work as Wolff’s heroine similarly confronts her uncle after learning about the supernatural world and he talks to her about the danger she is in. “*Why didn’t you tell me?*” demands the heroine. He explains that he kept her in the dark about the supernatural world to give her time to settle in after her move to Alaska after the deaths of her parents. (CRAVE, 343)

Hearing Voices in Her Head:

79. The heroines hear voices in their heads, warning them of danger and directing their actions.

80. In both Freeman's manuscripts and the CRAVE series the voices come from parallel characters. *The Abomination* in the Freeman manuscripts turns out to be the heroine's long-lost father who she believed to be dead. He tells her to call him *Athair*. *The Unkillable Beast* in the CRAVE series turns out to be the heroine's grandfather she never knew she had. He tells her to call him *Alastair*. They both are voices in the heroine's heads and the heroines do not know who they are. The voices give warnings to the heroines, and direct their actions: "Choose!" "Remember!" "Run!" "Beware!"

- "That new inner voice inside my head warned me that I needed to get it together. To get away before it was too late. To run!" (Freeman 2011, 472);
- "But the voice inside me is finally back and it's urging me to run, to get away..." CRAVE, 472-473.)
- "I couldn't break free even though the voice inside my head was screaming at me to look down, look away, look anywhere but at him." (Freeman 2011, 499.)
- "Even the voice inside me is screaming to get up, to get moving." (CRAVE, 479.)

81. Both heroines use a portal to visit the 'voice inside her head' character, who is a creature trapped in his supernatural form and she cannot free him.

- "But I'll be back for you. I promise." (Freeman 2012, 513.)
- "But I promise, we'll come back for you." (CRUSH, 547.)

82. Freeman's *Abomination* speaks Gaelic; Wolff's *Unkillable Beast* speaks Gaelic. (Freeman 2010, 208, 223; 2011, 207, 430, 472, 506; Freeman 2011, 577-578) (COURT, 45).

83. In the Freeman manuscripts the vampire prince has trapped the heroine's father Athair in chains, and he is stuck in his supernatural form in an iron trap. In CRAVE the vampire king has trapped the heroine's grandfather Alastair in chains, and he is stuck in his supernatural form in iron shackles.

NOTE: A second voice in Freeman's heroine's head leads to a very dramatic turn of events that parallels Wolff's second book CRUSH. Please see the discussion on CRUSH for those details.

The Heroine is Not Human:

84. Both heroines are told that Evil is out there in the world, and there is only one very special being who can stop it: This person who will save the world is a unique being meant to bring balance and is a combination of three sorts of supernatural beings. (Freeman 2011, 230-241, 268; CRAVE 344; COVET, 112)

85. But up to this point both heroines still think they themselves are mere humans. As the plot unfolds, both heroines learn they are *not* human and are told:

a) "There's magic in your veins." (Freeman 2011, 440.)

b) "There's magic in your blood." (COURT, 477).

86. The heroines learn they have immense supernatural powers. This has been kept from them—and in both books, in a singularly unique detail, their parents brewed special infusions of tea which served to bind up their powers and keep their powerful magic unknown to them. This was done because they believed it to be for the best, and the heroine's destiny now stretching before her is huge. (Freeman 2011, 463, 493; Freeman 2013, 344; Freeman 2014, 387); CRAVE, 484, CRUSH, 22, COVET, 398, 431.)

87. Let me add a note here about **TEA**: TEA is an important drink throughout Freeman's work, and TEA is mentioned often as the beverage of choice in both Freeman's work and throughout the CRAVE series. This is not a common trope of Young Adult novels, particularly where (as in both authors' works) TEA is used medicinally for its special powers and protections and is specifically and uniquely brewed by the heroines' families in both Freeman's work and in the CRAVE series to protect the heroines from being able to know—and access--their own powers. (Freeman 2010 p. 69; 2011 p. 75; 2012 p. 71; 2010 p. 162; 2010 p. 299; 2013 p. 294; 2013 p. 295; Midnight Overview, Notes 2009; The Cast, The Plot Notes 2008; Freeman Notes 1-27; special blends of tea: CRAVE, 214, 445; COVET, 202; binding powers: COURT 448.) The same beverage brewed for the same reasons by the same people and given to the heroines throughout their childhoods in both authors' works is a remarkable similarity that cannot be explained by *scènes à faire* or genre conventions.

88. To be clear, the details of these plot points go far beyond what could be considered literary tropes or genre conventions. These characters are drawn with exceptional levels of detail and find themselves in the same astonishing situation—learning that classmates and family members are actually supernatural creatures—and then learning that they are supernatural creatures whose powers have been hidden from them all their lives by their family’s special potions served as tea.

89. The binding of their magic has resulted in both heroines feeling the same way in their lives; they feel they don’t fit in:

(a) “I’ve felt out of place and out of touch my whole life.” (2012, 81, 2013, 89; Freeman 2011, 448; .)

(b) “...I felt odd, out of place, a fish out of water in my own body...and in my own life.” (COVET, 600)

Kidnapped by a Vampire:

90. As we move toward the conclusion of Freeman’s novel, the dramatic action ramps up when the heroine is kidnapped by the vampire prince (Julian). He intends to use the heroine to bring back his dead mate by making the heroine into a vampire. He believes that she will become his dead mate reincarnated, which will also accomplish revenge against the heroine’s father, Athair, who Julian believes killed his mate. Julian, it turns out, is responsible for the death of the heroine’s father and grandparents.

91. In CRAVE, Grace is kidnapped by a vampire (Lia) who is out to avenge the death of her mate, the vampire prince (Hudson) and intends to use the heroine in a spell to bring back her dead mate. She also wants revenge against the romantic lead, Jaxon, who she believes killed her mate. Lia, it turns out, is responsible for the accident that killed the heroine’s parents.

92. When both heroines are kidnapped, their hands are tied/cuffed. (Freeman 2010, 419-420, 455; Freeman 2011, 559). (CRAVE, 455)

93. And there is an ominous stone slab. (Freeman 2011, 494); (CRAVE, 455)

94. Finally, the heroines are told that Supernaturals have one mate/ a soul mate and are bonded for life. (Freeman 2011, 423-424, 495); (CRAVE, 484, 546)

Similar Battle Scenes Following the Kidnapping:

95. Both kidnapping scenes end with a Vampire killing the Jealous Girlfriend:

a) In Freeman's manuscripts, Julian the Vampire kills Selene (the vampire girlfriend who is jealous of the heroine) when she tries to attack the heroine.

(Freeman 2011, 552-553)

b) In Crave, Jaxon the Vampire kills Lia (the vampire girlfriend who is jealous of Grace) when she tries to attack the heroine. (CRAVE, 495)

96. In Freeman's manuscripts the romantic lead and his clan find the heroine and fight the Vampire Prince (Julian). The heroine also joins in the fight. The heroine sees a demon standing with a dagger poised to strike the romantic lead from behind. The heroine jumps on the demon's back and ends up stabbing it. The demon bows down before the heroine, making obeisance before disintegrating into dust.

97. In Wolff's CRAVE the romantic lead, Jaxon, finds the heroine and fights the Vampire Prince's mate (Lia). The heroine, Grace, also joins in the fight. The romantic lead ends up fighting the vampire prince (Hudson), who appears in the form of black smoke. Jaxon compresses the smoke into a ball and throws it at the vampire prince's mate. When it hits her, she whispers her thanks to the romantic lead before exploding into a cloud of dust.

98. Compare, too, these descriptions of the heroine being choked during battle--then rescued. Wolff's heroine is attacked and rescued by different characters than Freeman's, but the action and the language and the sequence is the extremely similar:

a) Freeman's description: "Before I knew what was happening, I found myself flung to the hard concrete floor, the life being choked out of me. I couldn't breathe." (Freeman 2010, 447; Freeman 2011, 552) "His strength was such that he threw her across the room... She fell into a heap against the wall." (Freeman 2010, 447; Freeman 2011, 552)

b) Wolff's CRAVE: "He reaches forward, wraps his hand around my neck. And then he starts to squeeze...I can't speak anymore, can't breathe..." (CRAVE 468-469). "Moments later he's on Flint, grabbing him by the hair and heaving him across the room into the opposite wall." (CRAVE, 470)

Evil released into the World:

99. Freeman's manuscripts and Wolff's first book in her series, CRAVE, then end in remarkably similar ways, with the same plot developments and many of the same details. Both heroines have learned that they are not human but Supernatural. They have incredible powers. They are in love with Supernatural boys. The loss of their parents continues to haunt them but they now have more understanding about what has happened in their families; they now suspect they are part of something much greater than they ever knew. They are not merely schoolgirls; they are powerful creatures with a great destiny before them.

100. In Freeman's manuscripts the heroine accidentally releases (*from another dimension*) Ronan the Bloodletter, who is said to be evil and responsible for the deaths of many others, into the world. The romantic lead and Ronan appear as though they will come to mortal blows. The Bloodletter, Ronan, has taken the heroine's blood and is now tied to her. It is believed that if he is free to walk the earth again, it would be a danger to the world. Freeman's story ends when the Bloodletter character turns into a raven and flies off into the night sky. The romantic lead decides to remain with the heroine. He vows to protect her and keep her safe. (Freeman 2011, 598, 600; Freeman 2012, 524; Freeman 2013, 454.)

101. In Wolff's CRAVE, the heroine sees Hudson, who is said to be evil, standing with a broadsword poised to strike the romantic lead from behind. The heroine grabs the romantic lead and wraps herself around him, putting herself in front of the sword. She turns into a stone gargoyle for the first time, saving the romantic lead's life—yet in doing so she has accidentally released Hudson *from another dimension*. He is now inside her head as she is frozen in stone as a gargoyle. It is believed that if Hudson was free to walk the earth again, it would be a danger to the world. CRAVE ends with the Bloodletter character turning into a winged creature and flying off; the romantic lead decides to be with the heroine. He vows to protect her and keep her safe. (CRAVE, 570-571)

102. CRAVE has three bonus chapters at the end told from the romantic lead's point of view and which offer additional material to the story that takes place after the heroine is turned to stone. These chapters make clear that if Hudson, who is thought to be evil and responsible for the deaths of many others, is brought back, it is believed that he will bring war, and it would be a danger to the world.

103. As set forth above, CRAVE closely tracks the main plot of Freeman's manuscripts. Wolff's subsequent three novels similarly track subplots from Freeman's original manuscripts as well as Freeman's notes and details sent to her agent. Although Freeman never wrote the trilogy she had originally planned, these details appear in COVET, CRUSH, and COURT. They are not stock or standard for the genre. Examples of these are set forth below.

**B. QUALITATIVE SIMILARITIES BETWEEN THE FREEMAN
MANUSCRIPTS AND CRUSH (book #2 in the CRAVE series)**

104. A subplot from the Freeman manuscripts mirrors the main plot of Crush: Powerful, magical objects must be found in order to stop Ronan / Hudson (parallel characters) from rising again, and to ultimately, stop the supernatural war. The heroine accidentally brought him back with her from another dimension where they were together. She doesn't remember him. She believes he is evil and responsible for the deaths of many, and that if he is free, he will bring war and it would be an apocalypse. In truth, he is not evil and is offended she would think so. He gives the heroine his magic, and there is an attraction between them, which she doesn't want to feel. Objects are found, the heroine must pass a trial, and the evil vampire prince / king gives the heroine his special bite (the Kiss of Life or Death / the Eternal Bite), which could / should kill her. The heroine escapes his clutches and survives. The vampire prince / king will be after her now.

105. The similarity in the details of these parallel story points is substantial, as set forth below:

Hearing Voices: and a New Romantic Lead:

106. In the Freeman manuscripts the heroine begins to hear a second voice in her head. This voice belongs to Ronan, known as *the Bloodletter*, thought to be dead, and said to be the embodiment of evil. There is a powerful attraction between the heroine and Ronan at the end of Freeman's novel (Freeman 2013, 449, 464-466). This relationship is intended to develop into a love triangle, and Ronan was to become the heroine's true mate –as Freeman outlined in her notes to her agent (*The World Notes*, 2010; Freeman 2010, 480, 484, 487-488; Freeman 2013, 464-466). At the end of Freeman's novel, the heroine has accidentally brought The Bloodletter back from another dimension.

107. Freeman intended to explore these developments in the trilogy she envisioned: “Ronan and Anna barely meet in book 1. He has been a guide to her and has spoken to her trying to help her in his wolf form from the Otherworld. She doesn’t remember him or his voice. When he shifts to human form, and they meet she is intrigued and attracted to him at first--. He gives her a summoning stone to contact him, kisses her and bites her lip, taking her blood so he can always find her. Love triangle for book 2. Ash wants to protect her. Ronan wants to help her learn to use her powers to restore the balance. Scene of them meeting again at Sanctuary for book 2.” (*The World Notes*, 2010)

108. At the end of CRAVE Grace is encapsulated in stone. In CRUSH, we learn that she has been stuck this way for four months—months which she cannot remember. She now learns that the new voice in her head is Hudson Vega — the older brother Jaxon believed he had killed. Grace has accidentally brought Hudson back from the other dimension where he had been trapped. A powerful attraction develops between Grace and Hudson, developing into a love triangle with the romantic lead, Jaxon, who is understandably upset that his evil brother is inhabiting Grace’s head.

Finding Magical Objects:

109. Freeman’s secondary plot is about the characters’ quest to find 13 powerful magical objects to stop the war and to keep Ronan from rising again.

110. Wolff’s second book’s main plot is about the characters’ quest to find 5 powerful magical objects to stop the war and get Hudson out of heroine’s body and strip him of his powers.

Ice Caves and The Bloodletter:

111. In Freeman’s 2010 notes to her agent she describes ice caves, and in her manuscripts the heroine learns of the evil being called *The Bloodletter*. This is an unusual setting and a spine-chillingly unique and specific name, unlikely to be conjured by another author by coincidence.

112. Yet we find both the same setting and the same unusual name in Wolff’s CRUSH, when Jaxon says to Grace, “I’m taking you to the Bloodletter,” who lives in *an ice cave* (CRUSH, 130).

113. In Wolff's ice cave in CRUSH, there are terrifying bloodstained buckets for draining human blood in the powerful vampire's lair. In Freeman's manuscript this horrifying detail of a drain in the floor used for draining human blood is first used in the pivotal scene near the end of the novel when Freeman's heroine has been kidnapped and is held captive in a powerful vampire's lair. (Freeman 2010, 431; CRUSH, 161).

114. In CRUSH, Jaxon takes Grace to see Wolff's version of the Bloodletter in an ice cave, and the Bloodletter tells them that the Unkillable Beast is the key to solving all their problems, including getting Hudson out of Grace's head and back into his own body.

115. In CRUSH, we learn that the Unkillable Beast is a gargoyle, like Grace. She can hear him in her head, warning her of danger. In the Freeman manuscripts, the parallel to the Unkillable Beast is the Abomination, a wolf-shifter/Sentinel like the heroine. She can hear him in her head, warning her of danger.

Special Initiation/ Coming into Powers Alone / Claiming Power:

116. In Freeman's work, her heroine will have a special initiation with the Witches / Priestesses at age 17, when she will come into her powers and be fully accepted as Kindred. Wolff uses this same plot point in CRUSH when the Vampire King insists the heroine, age 17, take part in the dangerous Ludares trials as her initiation to become accepted into the Circle.

117. In Freeman's manuscripts, Julian the Vampire Prince is the ultimate evil one who desires to take over the world and needs to be stopped. In CRUSH, Wolff's parallel character is Cyrus the Vampire King who desires to take over the world and needs to be stopped. Grace and Hudson and Jaxon and their friends need to fight Cyrus to save the world from his evil plans.

118. Grace demands a place on Cyrus's Council because she is the only Gargoyle born in 1000 years. Freeman's heroine is not a gargoyle but the Nyx—the most powerful creature born in 10 generations.

119. Cyrus the Vampire King says Grace has to earn her place at the Council in a series of battles at the Ludares games, where the high stakes mean Grace's life is in danger. But Grace has to go against Cyrus' team alone. In Freeman's manuscripts, Anna / Mia's *initiation into the Order of Priestesses/ Order of Witches* called Kindred is something she must go through *all alone*. She must choose shadows or light in order to *claim her power*. This plot point is important and shows up in each of the Freeman manuscripts:

- Freeman 2010 --Morrigan the Priestess tells Anna it is time she comes into her powers.
- Freeman 2013—Heroine Anna must learn to be *her true self*, she must learn her true destiny; she is an instrument of transformation; she is told she is **the key**.
- Freeman 2014—Heroine Ella must stop all the evil in the world by *claiming her powers. She must become her true self—the Nyx.*

120. The same plot points are echoed many times in CRUSH:

- CRUSH, 371-- Grace is told by Hudson, “You need to be yourself, your true self.”
- CRUSH, 570 --Hudson forces Grace to go to the trials *all alone*. (Winning the trials is the initiation that will permit Grace into the inner circle.)

121. **Note:** Wolff uses this same element again in COURT, the fourth book in the series: “You’re **the key** to everything, Grace.” She must fight as her true self—a gargoyle—she must *claim all her powers* and go through the trials *all alone*. (COURT, 51)

Gemstone Contains Vast Powers:

122. Freeman’s heroine (Anna/Mia) frees the evil Ronan/Aedan O’Faolain the Bloodletter, and he gives her the **moonstone** that contains vast powers.

123. In CRUSH, Wolff’s heroine Grace frees the Unkillable Beast and he gives her the **bloodstone** that contains vast powers.

Ceremonial Dagger:

124. In Freeman’s notes to her agent she describes *a ceremonial dagger* that is the one weapon that can kill the heroine when she comes into her powers and *the Morrigan* is a character;

125. In CRUSH, the *Dagger of Morrigan* is stolen to try to kill the heroine.

Shackles and Trapped Supernatural Beings:

126. There are two trapped supernatural creatures in Freeman’s work, and two trapped supernatural creatures in Wolff’s work. They are essentially the same characters and serve the same purpose; they have the same relationship with the heroine.

127. Creature Pair #1: In Freeman's work we have Ronan, who is the parallel character of Hudson in Wolff's work. Both characters are trapped in another dimension and are accidentally freed and brought back into the world by the heroines.

128. In Freeman's work Ronan was trapped in the other dimension in the body of a wolf; then he is released into the world as a man in his own body. In Wolff's work, Hudson was trapped in the other dimension in his own body; then he is released into the world but is now trapped in the heroine's body.

129. These characters are each described as royal and speak English with an accent; both have 'stormy blue eyes':

- a) "... the blue of a storm at sea." Freeman 2011, 592; "...a stormy blue..." Freeman 2011, 594.
- b) "...storm-tossed blue." CRUSH, 163. "...stormy blue..." COVET, 235.

130. Creature Pair #2: In Freeman's work we have the *Cursed Abomination*. The Cursed Abomination in his supernatural form, is caught in an iron trap. This turns out to be Athair, the heroine's long-lost father, believed to be dead. Athair was imprisoned in the iron trap by the Vampire Prince. In Wolff's work we have the *Unkillable Beast*. The Killable Beast, in his supernatural form, is trapped in iron shackles. This turns out to be Alastair, the heroine's grandfather, believed to be dead. Alastair was imprisoned in iron shackles by the Vampire King.

131. Julian the vampire prince and Cyrus the vampire king are parallel characters in Freeman's and Wolff's work:

- Both are striving to bring the supernatural creatures out of hiding and into the world.
- Both vampires have a special BITE they are known for. The Vampire Prince's bite is the "Kiss of Life or Death." (Freeman 2011, 533); The Vampire King's bite is the "Eternal Bite" (CRUSH, 217).
- One is described as "like a king cobra" (Freeman 2011, 552) and the other "like a cobra" (Crush, 380).

132. In Freeman's body of work the heroine sees a man in chains through the mist, in pain, with anguish in his eyes. The order of the sphinx has turned corrupt, and the man made of mist appears full of sadness and pain. (Freeman 2016, 81) In COVET we encounter again the Killable Beast from CRUSH who is cuffed in iron shackles. When freed by the heroine at last

from the shackles, he shifts into a man. (COVET, 649). Later he transforms into a man coming to her through the mist. (COURT, 32)

133. In Wolff's work this man in the mist is Alistair, the heroine's grandfather. In Freeman's body of work the man in the mist is Athair, the heroine's long-lost father. Both speak Gaelic.

134. Neither the overarching storyline nor the specific similarities are generic or stock elements of Young Adult literature. There is no call in paranormal romance for a supernatural being thought to be pure evil who is in another dimension to keep the world safe... but who is then accidentally released back into the world by the heroine, who then must deal with what she has unleashed. And in dealing with this powerful being, each heroine comes to learn he is not evil at all, and that he—rather than the first romantic lead—is perhaps her one true love and mate. There are no tropes about cobras, or Gaelic, or shackled supernatural creatures set free and walking through the mist.... These nuanced characters and detailed storyline have nothing to do with genre conventions.

135. We don't learn that the Unkillable Beast is Alistair until COURT, book 4 in the series, but Wolff lays the groundwork in CRUSH and COVET.

C. QUALITATIVE SIMILARITIES BETWEEN THE FREEMAN MANUSCRIPTS AND COVET (book #3 in the CRAVE series)

136. Another subplot from the Freeman manuscripts is used as the main plot of *Covet*. Specifically, the heroine must restore the Compact (Freeman) / find the Crown (Wolff) in order to stop the supernatural war and bring balance. The vampire prince (Freeman) / vampire king (Wolff) wants to bring supernaturals out of hiding from the human world. He wants war among the supernaturals. He wants power. The heroine is told about twin goddesses and that she is a descendant of one of them. She is told she is a queen. A tarot reading is performed and the heroine draws the Tower card out of a deck of 78 cards. Magical tattoos appear on the heroine and they are spells. Her tattoo "itches and burns" and she is lit up with "pin pricks" / "needle pricks" of magic. She learns that her kind of being are protectors of humans, supernaturals, and other creatures, and that she is to maintain / keep the balance.

137. And again, a look into the details of these parallel storylines reveals substantial similarities.

138. In COVET, Grace must make up the missed schoolwork from the months she was trapped as a stone statue. She must deal with her complicated feelings for Hudson and Jaxon, the two brothers who both believe she is their true mate, and she must—most crucially, find a way to defeat the vampire king who is bent on slaughter and plans to take over the world, bringing paranormals out of hiding. Grace needs to become a member of the court in order to have a chance to avert war. As Grace and her friends try to avert war, they are sent many tests and quests to be completed, each leading to bloody battles and trials. Wolff's book is so full of these, that it is easy to overlook that the basic plotline still mirrors Freeman's manuscripts and notes.

139. Freeman's heroine embraces her abilities and doesn't turn away from anything. She's strong and independent, and she's willing to do whatever it takes to help the people around her. The vampire prince wants to bring supernaturals out of hiding and must be stopped. He wants to take over the world. (Pitch Notes to Emily Sylvan Kim 2013). At the end of the Freeman manuscripts we learn—and the heroine learns—that her friends are also supernaturals engaged in the fight to save the world. Freeman has a perfect set-up with her heroine, the romantic lead, his sister and their friends to move forward into the planned trilogy, meeting every challenge.

140. Wolff's heroine is the same. Grace, along with Jaxon and his brother Hudson and their band of supernatural friends, move through the story together, helping each other out of crisis after crisis as Grace takes on more and more dangerous challenges in her attempt to save the world.

141. In Freeman's work, the Order wants to destroy the heroine because they fear she will tip the balance in the war.

142. In Covet, Cyrus, who is the head of the Council (BMR's Order) wants to destroy the heroine for the same reason.

Burning Hands:

143. When Freeman's romantic lead tells the heroine about his powers, his hands start to burn. Breaking these magical rules is what brings on this agony. (Freeman manuscripts 2010, 179; 2011, 231-233).

144. Wolff works that same detail of burning hands into her third book in the series, when the romantic lead's hands start to burn when he breaks the magical rules (COVET, 146).

Nausea and Vomiting in presence of Evil:

145. When Anna touches Taylor, she feels nauseated and she vomits. (Freeman 2010, 119; 2011, 281) The voice of the demon in her head causes nausea. (Freeman 2011, 315)

146. Grace and Hudson enduring the Chamber, and the proximity to evil causes Grace to vomit. (COVET, 488)

Twin Goddesses:

147. In the Freeman manuscripts the heroine learns about the Sacred lineage of power: The priestess tells of the heroine's relatives—the heroine turns out to be descended from Twin Goddesses Isis and Nephthys, who are meant to bring balance to the universe. (Freeman 2016, 104-105)

148. In Wolff's series the heroine learns about the Sacred lineage of power: The Crone tells Grace of her lineage; Grace turns out to be descended from the Twin Demi-gods, Cassia and Adria, who are meant to bring balance to the universe. (COVET, 390-396) (These Twin Goddesses are referenced again in COURT, 170)

Tarot Cards:

149. In all of Freeman's manuscripts the Tarot readings let Anna / Mia / Ella know what her true path is and predict her path—and her need to choose between Shadows and Light.

150. Although there are 78 cards in a standard Tarot Deck, in both Freeman's work and Wolff's series the important card drawn is the TOWER. In Freeman's work, Taylor tells Anna: "He said you're a Queen," (referring to the vampire prince). (Freeman, 2012, 486.) In Wolff's novel, Lester the troll reads the Tarot cards and picks the same TOWER card, for Grace and reveals "There is only one path for you, My Queen." (COVET, 540)

Magical Tattoos/ the CROWN:

151. Magical tattoos appear on heroine Anna/Mia/Ella's neck and spine as she gains new powers. She is marked with tattoos on the back of her neck and down her spine as part of a prophecy that she will come to power. And when she meets with magic, the tattoo at the back of her neck burns. (Freeman 2011, 150, 469-70; Freeman 2012, 119, 120, 134, 262; Freeman 2013, 60, 124, 139, 266.)

152. Magical tattoos appear on Grace's arms and hands as she gains new powers. The tattoo she gets in prison is to give her power that has long been meant for her as part of a prophecy. (COVET, 550). When Grace uses her power, her tattoo burns. (COVET, 600)

153. The description of these tattoos effects on the heroine are remarkably similar:

- "And when I did, my back lit up on fire, thousands of tiny pin pricks."
(Freeman 2011, 436)
- "My tattoo burns as the magic lights each tiny needle prick..." (COVET, 623)
- "...my neck and my back, burning and itching..." (Freeman 2011, 469-470)
- "...it's suddenly burning and itching..." (COURT, 654)
- "My neck and back are on fire..." (Freeman 2011, 388)
- "My whole hand catches fire." (COVET, 603)

154. There are no genre conventions or tropes about twin goddesses, heroines nauseous in the presence of evil, burning hands, tattoos or tarot cards, yet these unusual, specific and detailed elements appear in both writers' work in remarkably similar contexts.

D. QUALITATIVE SIMILARITIES BETWEEN THE FREEMAN MANUSCRIPTS AND COURT (book #4 in the CRAVE series)

155. As with the first 3 books of the CRAVE series, another subplot of the Freeman manuscripts is substantially similar to the main plot of *Court*. Specifically, in each book the heroine meets the character who has been the voice in her head--one who was trapped and who she visited by portal earlier in the story. He is a creature like her, and she now learns he is her *father / grandfather*. He speaks *Gaelic*. Their kind of supernatural beings are a clan who can communicate with one another telepathically. He tells her to call him *Athair / Alistair*. The vampire prince / vampire king is responsible for him having been trapped in chains in his supernatural form. This villain has kidnapped the students at the heroine's school and is holding them hostage to get what he wants. Taking them may cause the supernatural war. He is draining them of their powers by taking their magic into himself. He threatens to drain the heroine's friends unless she does what he wants. She makes a deal with him to save her friends. She sacrifices herself rather than have her friends come to harm. She ends up tricking him and he is injured. A structure like Stonehenge, a "small" Stonehenge / "Stonehenge Lite" is mentioned. *The vampire prince / vampire king has a daughter by a woman who is not his mate.*

This daughter is related to the heroine by blood. She is the heroine's half-sister in Freeman's work and the heroine's cousin in Wolff's. She is a supernatural teen like the heroine and her friends, is nasty, and is aligned with her father, the vampire prince / vampire king. Although she is nasty to the heroine, she helps her, but stays with her father. War is on the horizon, the vampire prince / king is not dead, and he will come after the heroine.

156. Wolff's heroine Grace and her friends barely escaped the last battle of Book 3, COVET, with their lives. With war on the horizon, Grace needs an army if they stand a chance to save the world, but before they can do battle, they need answers to some very important family secrets. The romance and love scenes are more prominent in this book than in the Freeman manuscripts, as are the continuing battles and scenes of torture and trials that Grace and friends experience. But still qualitative similarities can be found with Freeman's work:

Trapped in Iron / Long-Lost Supernatural Relatives:

157. In Freeman's work, the heroine learns that the Abomination, trapped in an iron trap, is actually her long-lost father. She learns he is a supernatural--a Sentinel. Sentinels communicate telepathically. They also speak Gaelic. He tells his daughter to call him "Athair."

158. In her third book, COVET, Wolff's heroine frees the Unkillable Beast from his iron shackles. She then learns that the Unkillable Beast is actually her long-lost grandfather. She learns he is a supernatural—a Gargoyle. Gargoyles communicate telepathically. They also speak Gaelic. He tells his granddaughter to call him "Alistair." (COURT, 34, 45, 175).

Oath of Protection:

159. In Freeman's manuscripts, The Wolf Pack of Sentinels vows to protect Anna with their lives. They slice their palms with a dagger and clasp hands in a binding oath to signal this promise. (Freeman, 2010, 357-358; Freeman 2011, 446-447; Freeman 2012, 369; Freeman 2013, 337; Freeman 2014, 274)

160. In COURT, The order of vampires vows to protect Grace with their lives. They tap their chests dramatically with closed fists to signal this promise. (COURT, 68)

Gaelic, Ireland, Bowing Down:

161. Freeman's character Ronan / Aedan O'Faelain speaks Gaelic as does the heroine's father. The Demon bows to Anna, speaks Gaelic. (Freeman 2010, 208, 223, 306, 318, 470, 482; Freeman 2011, 111, 221, 222, 435, 439, 440, 450; Freeman 2014, 183, 254, 351, 354, 355, 363.)

162. In COURT, Grace is transported to the Gargoyle Court in Ireland. They are speaking in Gaelic. (COURT, 45, 46). The gargoyles are waiting for their queen to lead them. Everyone drops to their knees, bowing down to Grace. (COURT, 34)

Hiding the Child / Magical Tea:

163. In Freeman's work, the heroine's grandmother is the daughter of a goddess who had to hide her pregnancy and hide her child from Julian the Vampire Prince. The way to hide this was by binding her up in magic using magical potions disguised in tea. (Freeman 2011, 575; Freeman 2013, 91, 417, 436; Freeman 2014, 158, 159, 333; Midnight Overview notes 2009; The Cast notes 2008)

164. In COURT, the Bloodletter, who is Grace's grandmother, had to hide her child (Grace's mother) from Cyrus the Vampire King by binding up her magic (COURT, 181). The magic was held in check by frequent doses of magical potions disguised in tea (COURT, 448).

Secret Siblings / Cousins:

165. Freeman's heroine and the once seemingly evil mean-girl Taylor are revealed to be half-sisters. (Freeman 2014, 339-347)

166. Similarly, the heroine Grace and the once seemingly evil Isadora/Izzy are revealed to be cousins. (COURT, 462, 466)

167. What both of these secret relatives have in common is that their *fathers are the same characters* in both Freeman's work and in COURT: parallel characters Julian the Vampire Prince and Cyrus the Vampire King.

Most Powerful Being in 1000 Years/ The Chosen One:

168. Freeman's heroine (Anna /Mia /Ella) turns out to be the Thriceborn Nyx, the Chosen One, who will save the world—she is *queen, witch, sentinel, descendent of a goddess*. (Freeman 2011, 243; 2012, 485).

169. Wolff uses this same construction of a three-fold supernatural creature with immense power when it is revealed that her heroine Grace is the Chosen One who will save the world—as *gargoyle queen--part witch, part demi-god*. (COURT, 165)

170. Freeman’s heroine Anna is crowned with a circlet of moon and stars. (Freeman 2012, 200-201). The Nyx is the Chosen One. The most powerful being born in 10 generations. Keeper of the Amulet (Freeman 2016, 107).

171. Similarly, Grace is the most powerful being; the only Gargoyle born in 1000 years. (COVET, 50) The Crown tattoo appears on Grace. “I have the crown.” (COURT, 90)

Description of Shining White Courts:

172. Freeman’s heroine’s grandmother is an Egyptian Priestess in the Court of Isis. Priestesses are dressed in white, the temple is of white marble, with tall white columns. (Freeman 2016, 80-98)

173. Grace’s grandmother shows Grace the memory of a dance at the Gargoyle Court, with dancers dressed in white; there are white marble columns and alabaster tapestries of white and gold. (COURT, 173)

Controlling the Natural World:

174. Freeman’s heroine can control the natural world; so can Wolff’s:

175. Freeman describes her heroine’s powers in her notes to her agent:

-- “*Anna’s Powers – Powers of the dark moon goddess, Prophecy, visions, Death / Transition/ dispensing justice, Ravens, snakes, wolves – she can hear animals associated with the goddess, blowing out lights – she can harness electricity Powers of Light – Truth sensing, creating fire, using the elements blends both... Powers, plants – growth – old ability of making things grow for the harvest...*” (Freeman, Pitch Notes to Emily Sylvan Kim, 2013)

176. Wolff worked similar details into Grace’s powers in COURT, when Grace exhibits new powers—the ability to make things grow: “I can see you’re coming into your godhood finally...the flowers were a nice touch...” (COURT 464); “Did Cassia not tell you that chaos magic gave birth to Mother Nature? You are a part of that magic, just as she is...” (COURT, 464)

Twisted Backstories and Family Secrets:

177. Freeman's character of Julian the Vampire Prince has a tortured backstory and a dreadful marital history. He is the crown prince of the Incubi. He believes that supernaturals should take over the earth, and that this is their rightful place. Julian wants the Old Ways restored. Freeman describes her vision of this situation in her notes to her agent:

(a) The Dark Moon Goddess, the Morrigan, resurrected Julian's wife Elise to serve as the High Priestess of Avalon, recognizing that she has an important role to play in the heroine's destiny.

(b) Elise cannot cross out of Avalon and live. She has severed all ties with her ruthless husband.

(c) When Elise died, her baby—who is Freeman's heroine--was given to Elise's twin sister Marcheline to be raised in the human world as her daughter.

(d) Marcheline turned her back on the Craft and severed her ties to Avalon. She and her husband Dante had to hide this tortured heritage from the heroine. Freeman later reshaped her story so that the heroine turns out to be descended from Twin Goddesses Isis and Nephthys, who are meant to bring balance to the universe. The heroine has been kept from knowing her true identity by being raised as a human, her powers kept from her by frequent infusions of tea.

178. Wolff creates an equally tangled and parallel backstory for Cyrus the Vampire King and his wife Delilah, merging with the tale of the warring demi-god twins, Cassia and Adria. As a power-hungry ruler, Cyrus seeks to influence and control everyone. A thousand years ago he tried to steal the gargoyle crown in order to make himself a god. He was able to vanquish and destroy the entire race of gargoyles, but the crown was securely hidden from him. He continues to seek it throughout COURT in the hopes of obtaining ultimate power and ruling the world as a demi-god.

(a) Delilah Vega, The Vampire Queen, is cruel and calculating and hates her husband but must be subservient to him.

(b) She put a spell on Grace's cousin, Macy's mother, Rowena, to take her from her child.

(c) Baby Grace is raised in the human world, kept from her powers by frequent infusions of tea. (COURT, 170)

179. It is a very specific similarity that the Vampire Prince and the Vampire King in these two authors' works have both sired a daughter by a woman who is not their wife, and this daughter turns out to be related to the books' heroines.

The Heroine is the KEY.

180. By the end of Freeman's material and by the end of the COURT, each of the heroines realizes SHE IS THE KEY to restore balance in the world.

- a) "Anna is the key." (Freeman's KEY 2009; Freeman 2011, 239-254, 470).
- b) "You're the key to everything." (COURT, 51)

E. ADDITIONAL SIMILARITIES IN LANGUAGE USE AND REFERENCES

181. Along with parallel characters, context, and action and even dialogue, I also found that many of the actual words and references Freeman uses when writing her scenes mirror those in Wolff's books, as discussed below in this section.

182. Freeman's manuscripts and CRUSH begin with the heroine having no memory of what has happened to her. In Freeman's work, after the heroine's spirit has been in another dimension she comes to consciousness with injuries she can't explain and can't remember what's happened. When she tries to remember the accident that killed her family she has terrible head pain, "blinding headaches." And she feels like memories are 'locked in a box.' (Freeman 2011, 3; 2012, 7; 2013, 10; 2014, 8; 2010, 9; 2011, 12; 2011, 79.)

183. In CRUSH the heroine's spirit has also been in another dimension. She comes to consciousness after having been in her stone gargoyle form for four months and can't remember what has happened. She has injuries she can't explain. When she tries to remember, she has terrible head pain that feels like 'barbs' poking into her head. Her memories feel like she's running into a 'wall.' (CRUSH, 1, 5.)

184. Around these similar storylines are words common in English but with a proximity and use (context) in the unfolding story that tracks with striking similarity, including:

- (a) Freeman 2011, 3: She feels that 'something's not right.'
- (b) CRUSH, 4: She feels that 'something isn't right.'

185. In both books, in the first several pages with her inability to remember what has happened, the heroine wonders: "am I dead?" (Freeman 2011, 3. CRUSH, 17-18.)

186. These early scenes also include discussion of body hairs prickling/tingling:

- (a) “A strong feeling of being watched makes the hairs prickle on the back of my neck.” (Freeman 2011, 3; 2010, 2. 2012, 6. 2013, 8. 2014, 6)
- (b) “unease slides across the back of my neck . . . causing the hairs on my arms to tingle.” (CRUSH, 4)

187. And then within a page Freeman writes “Something is wrong. Very, very wrong.”(Freeman 2011, 4. 2010, 2. 2012, 6. 2013, 8), while Wolff writes “Something is very, very wrong.” (CRUSH, 7)

188. In the same proximity each heroine mentions people stopping in their tracks:

- (a) Everyone stops cold in their tracks and stares, including me.” (Freeman 2012, 16. 2010, 12. 2011, 15. 2013, 18. 2014, 14).
- (b) “Especially when people literally stop in their tracks to watch us go by...” (CRUSH, 3)

189. In both stories the heroine’s kind are described as “protectors”:

- (a) Freeman, 2012, 197, 385: “We’re protectors of humankind from Others—non-humans.” ; “The Kindred are protectors of the land and all of its creatures, including humans. They protect against demons but also against humans who disturb the natural balance.”
- (b) Crush, 220, 219: “Gargoyles kept the balance among all the paranormals...and every other not-just-human creature on the planet—and also humans.”; “...and that’s why gargoyles have always been protectors.”

190. And both stories incorporate a remarkable number of the same or similar books and popular culture references, including the heroine’s mention of a Shakespeare play during the opening sequence of the story, using *The Three Musketeers* quote by Alexandre Dumas (although in reverse order by Wolff). There are also references to *Peter Pan*, *Sleeping Beauty*, *Superman and Lois Lane*, *the Hulk*, *Twilight*, *Humpty Dumpty*, *Frankenstein*, *Harry Potter*, *Snow White*, *Romeo and Juliet*, *Star Wars*, *The Wizard of Oz*, *Lord of the Rings*, *Invasion of the Body Snatchers*, and *Grey’s Anatomy*. *Barbie* and *Tom Cruise* are also mentioned. It is my opinion that these particular shared historical and popular culture references, discussed further below, have nothing to do with genre.

191. **Shakespeare Plays:**

- (a) “*MacBeth*? Really?” Freeman 2012, 4. 2013, 6. 2014, 5:
- (b) “I thought I was going to have to read *Hamlet* all by myself today.” CRUSH, 2:

192. The Three Musketeers:

- (a) “All for one and one for all...” Freeman 2011, 518:
- (b) “One for all and all for one?” CRUSH, 89:

193. Peter Pan:

- (a) “Ash took my mittened hand in his bare one as we leaned over the railing, peering down at the carpet of snow. I could feel my lips tremble. “I’m sure I’ve seen this in a movie before. Was it Peter Pan and Wendy...” Freeman 2011, 484.
- (b): “So flying’s easy. You just need to think—” “Happy thoughts?” I ask dryly. He cracks up. “You’re a gargoyle, not Peter Pan.” CRUSH, 328

194. Sleeping Beauty:

- (a): “It looked just like the sort of bed Sleeping Beauty might have slept in waiting for her prince to find her and break the spell—the wood carved with curlicues and fanciful swirls.” Freeman 2011, 210
- (b)” ... cheerful carvings on the staircase and room railings ... As I look at this place, I’m reminded of one of the versions of Sleeping Beauty... After the girl pricked her finger and fell asleep for a hundred years... COVET, 242:

195. Superman and Lois Lane:

- (a) “I’m sure I’ve seen this in a movie before. Was it Peter Pan and Wendy or Superman and Lois Lane?” I tried to joke. Freeman 2010, 386; 2011, 484
- (b) “I feel just like Lois Lane... You know, in the movie. Superman crushes coal to give Lois a diamond.” COVET, 282

196. The Hulk:

- (a) “The Incredible Hulk already has the door open and waiting.”; “And I run—smack into the Hulk’s chest.” Freeman 2013, 59
- (b) “You’re Iron Man and the Hulk all rolled into one.” COVET, 179

197. Twilight:

- (a) “I think it’s more like Edward and Bella, though,” she said with a wink.” (referencing the leads from *Twilight*) Freeman 2011, 484

(b) “If you think I’m watching *Twilight* one more time New Girl...” COVET, 284

198. **Humpty Dumpty**

(a) “Humpty Dumpty sat on a wall. Humpty Dumpty had a great fall. . .” Freeman 2011, 346

(b) “Humpty Dumpty Got Nothing on Us.” COVET, 414

199. **Frankenstein**

(a) “Apparently, the next time I saw Ash, if I ever saw him again, I could very well be a monster of Julian’s creation. Frankenstein’s bride.” Freeman 2012, 474

(b) “I read Frankenstein last year—I can only imagine what abomination she’ll bring back from the dead if her little plan actually works.” CRAVE, 485

Note: This quote is at the same point in the story and it is used in the same context. The heroine is going to be used by the vampire prince / vampire prince’s mate to bring the dead mate back and she wonders about Frankenstein in this scene.

200. **Harry Potter**

(a) “Just think of what I’m doing as my very own ‘sorting hat.’” “You’re really quoting Harry Potter...” Freeman 2011, 533

(b) “I can’t help wondering if this castle--like Hogwarts--comes equipped with its very own ghosts.” CRAVE 53

201. **Snow White**

(a) “Snow White,” she whispers. Freeman 2014, 102

(b) “Or Snow White, for that matter.” COVET, 665

202. **Romeo and Juliet**

(a) “We’re star-crossed before the first date. Romeo and Juliette.” Freeman 2011, 284

(b) “What it sounds like is some magical, next-gen *Romeo and Juliet* shit.” COVET, 407

203. **Star Wars**

(a) “No one made any attempt to hide Otherness in this place—it was the cantina scene from “Star Wars,” only I was in it.” Freeman 2011, 495

(b) “The Star Wars movie where everybody dies???” CRAVE, 191

204. **Wizard of Oz**

(a) “Vampires trolls and demons oh my.” Freeman 2011, 500

(b) “Vampires, dragons and werewolves oh my!” CRAVE, 324

205. **Lord of the Rings**

(a) “It sounds kind of like the One Ring in ‘Lord of the Rings’ or something...”
Freeman 2011, 292

(b) “...I almost pat the familiar silver foil wrapping and whisper, *My precious*.”
CRUSH, 184

206. **Barbies and Pink**

(a) “Rising from her seat she struts to Amanda’s closet and slips her feet into
pink stillies with bows. Barbie shoes.” Freeman 2013, 267

(b) “That shade of pink reminds me of surfer Barbie more than it reminds me of
home, but no way am I going to say that to her.” CRAVE, 42

207. **Tom Cruise and Old Movies**

(a) “‘And I love all of the ‘Raiders of the Lost Ark’ movies too.’ He gave his best bad-
boy grin, one that would do Tom Cruise proud.” Freeman 2011, 42

(b) Freeman 2011, 42 “So you’re an old movie buff? Or just an old Tom Cruise movie
buff?” Freeman 2011, 42

208. **Grey’s Anatomy**

(a) “Jake was formerly the hottest guy in school (now that Mr. McDreamy was
here and had taken his place)... Freeman 2011, 21

(b) “Or is that just something they do on *Grey’s Anatomy*?” CRAVE, 281

209. **Stonehenge:** Both authors not only mention Stonehenge, but talk about a
small versus large Stonehenge structure, as well as harnessing/channeling energy
and portals.

(a) They presented slides of the stone circles, like a small Stonehenge, the fort
hills ancient stone carvings... (Freeman 2011, 113). “There’s an energy vortex
here... the Earth’s energy is particularly concentrated... our ancestors built
structures to mark them, like Stonehenge ... These structures were placed at

specific equidistant points as a means of harnessing energy and are used as portals...” Freeman 2011, 233)

(b). “...we finally reach the other side of the mountain...”Is that *Stonehenge*?” ...Hudson studies the structure, a ring of stone pillars... “It’s similar but not exactly.”... This structure looks like it could have been built five thousand years ago. (COURT, 588). “Alright, Stonehenge Lite it is.”... his original ability was channeling energy, right? ... Likely he can harness lightning... Remy will portal the rest of us over and punch through it.” (COURT, 594-595).

210. These are all, of course, historic and/or popular culture references that no one has a monopoly over and many other books have used. But there is nothing about the Young Adult genre that would call for the use of any of them, and the shared combination of all of them in both authors’ works is remarkable.

211. The Crave series also mentions many of the same geographical places as Freeman’s work, including, New York, Hawaii, Hawaiian vacation, San Diego, Anchorage, Alaska, and Denali.

212. And both works mention many of the same languages, including Gaelic, Sumerian, Greek, Egyptian, a “crisp British accent,” and Scottish / Irish.

213. None of these similarities are tropes or can be attributed to genre conventions.

V. THE DIFFERENT VERSIONS OF THE FREEMAN MANUSCRIPTS DO NOT CHANGE THE FACT THAT ALL VERSIONS REFLECT THE SAME BASIC STORY AND CHARACTERS:

214. There is a process of writing well known to writers that is often referred to as “mosaic” or “patchwork” writing. Those terms can reflect the efforts of an author to deconstruct and then rewrite another work, whether of his or her prior creation or not.

215. In academia the terms “mosaic” or “patchwork” are often used to discuss forms of plagiarism—as described by Bowden College this way: “*Mosaic Plagiarism occurs when a student borrows phrases from a source without using quotation marks, or finds synonyms for the author’s language while keeping to the same general structure and meaning of the original. Sometimes called ‘patch writing,’ this kind of paraphrasing, whether intentional or not, is academically dishonest and punishable – even if you footnote your source!*”

(<https://www.bowdoin.edu/dean-of-students/conduct-review-board/academic-honesty-and-plagiarism/common-types-of-plagiarism.html>). It is further defined by Northern Illinois University this way: “Direct “patchwork” plagiarism occurs when a writer copies material from several writers and rearranges that material with no attempt to acknowledge the original sources.” (<https://www.niu.edu/academic-integrity/faculty/committing/examples/direct-patchwork-plagiarism.shtml>) .

216. Mosaic and Patchwork are both words that refer to the cutting apart and reassembling of pieces of a whole, whether ceramic tile or fabric—or a manuscript. Imagine taking a piece of floral fabric, cutting it into pieces and then reassembling it into a quilt. Although the pieces are now placed in a new relationship to each other, it is still perfectly plain that the original floral fabric is there (even if it is now surrounded by scraps of vivid modern cloth). To go back to my earlier metaphor, it is as if a house designer has taken the furniture in one house and just redistributed it in somewhat different positions in other rooms of that house, adding different colors of paint and changing a carpet or two.

217. I teach my students how writers use the mosaic or patchwork technique legitimately as they craft and revise their own novels-in-progress. This sort of cut-and-paste revision is a process whereby a writer will take earlier manuscripts, pull them apart and rearrange them to improve the way the story and characters are presented. The process often involves taking the details, themes, characters and dialogue of an early draft and then rearranging scenes and altering details of conversations to create a new (and hopefully improved) version. Essay writers do this as well, reorganizing their material to shape it into its most effective form. (I have used it even now, writing this report, as I move paragraphs around and rephrase sentences to make my points as clear as I possibly can.)

218. I recognize this revision technique as exactly what Freeman used in preparing each of her manuscripts; editing, reordering scenes, changing some details, adding others. Understanding how the mosaic/patchwork process works is vital to this case as it clarifies that the differences among the various Freeman manuscripts comes from the editing/revision process and does not change the fact that they are all still telling one comprehensive story.

219. Writers sometimes change and manipulate every paragraph and every scene of their own original work in their attempt to tell the story to their satisfaction. This process is perfectly normal and expected of writers.

220. To explain this point, I might briefly explain how I came to write my award-winning novel *Sweet Miss Honeywell's Revenge*, a middle-grade ghost story about a 12-year-old girl, Zibby, who buys an old dollhouse and finds it teeming with ghosts, which I mention earlier in this report. This novel was published by Harcourt in 2004 and has been a favorite with 5th through 7th graders for almost twenty years now.

221. What my readers are unlikely to know is that the book was born out of a trio of books I had been asked to write a full decade earlier by Scholastic. They asked me to write three 'Ghost in the Dollhouse' books with the thought that it might become an ongoing series. I invented the characters, the situation, and I wrote three short books: *Dollhouse of the Dead*, *The Headless Bride*, and *Rest in Peace*. The three novels were published in 1997. In each book Zibby and her friends dealt with the havoc caused by ghosts in the antique dollhouse, but the various mysteries were never truly solved, nor the ghosts laid to rest because the series was meant to be episodic, and ever-ongoing.

222. To my disappointment, my trio of books was not picked to become a series and quickly went out of print. I felt they'd barely had a chance to find readers! So my literary agent asked for the copyright to be returned to me, and then she approached a different publisher—Harcourt—about putting them back into print. My editor at Harcourt liked the stories but wanted them turned into a single novel. I was eager to do this, and I set to work deconstructing my three books.

223. This was a big job. I kept the core story, the characters, and many of the situations from the three books, but I also added new scenes and new subplots and some new characters; there are many scenes from the first three books that I left out entirely because they did not fit now with the new direction I was taking the story. But, using the mosaic technique, I patchworked my three original books into a big fat single novel. *Sweet Miss Honeywell's Revenge*, at its core, is based on the *Ghost in the Dollhouse* trio. The ending of my single novel is new, and there are many new scenes, but anyone reading the original trio of novels can tell that *Sweet Miss Honeywell's Revenge* is essentially the same story. As the author of all the material, it is mine to manipulate, rearrange, and patch together as I see fit.

224. There are, of course, many other examples of deconstructing and revamping an older version of a work to where virtually none of the characters or dialogue are entirely the same even though they are unquestionably the same original story. One such example is the 1978

musical *The Wiz* directed by Sidney Lumet, which was based on the 1939 movie *The Wizard of Oz* (from the book written in 1900 by Frank L. Baum). Both films are musicals, though the songs are different. The 1939 film has an all-white cast, while the 1978 film has an African-American cast. The setting of Oz is an Emerald City in the older film, while in the 1978 film it has been reimagined as a modern New York City. Many elements are different, but the core of the story, the plot, the characters, their motivations and feelings, the dangers they encounter, the pacing, the climax and the resolution are all the same. There is no question of plagiarism as long as the producers of *The Wiz* had permission to use the original material of the *Wizard of Oz*.

225. Returning to our discussion of Freeman's methods of revision, we can see that the basic story, plot, characters, their motivations and feelings, the dangers they encounter, the general pacing of events, and climax of Freeman's various manuscripts are consistent throughout all the versions. And in my professional opinion, these same specific elements from Freeman's work can be found in Wolff's Crave series.

VI. CONCLUSION

226. The significant number of similarities I've found between Freeman's original material and the first four books of Wolff's CRAVE series are not reflective of genre tropes. They cannot be chalked up to mere genre conventions.

227. Rather, it is my finding that the plots, characters, situations, language, mental states of characters, reactions of characters, physical conditions of characters, details of a magical world, settings, themes, and even contextual dialogue found in Wolff's work are specific to the original work by Lynne Freeman.

228. The remarkable similarities between the storylines, plot, setting, characters—including mental states of characters, reactions of characters, physical conditions of characters—and the other elements of Freeman's material and the first four books of Wolff's CRAVE series are substantial. These striking similarities go far beyond genre conventions or tropes, and would not be expected to occur in works that were independently created. Given the myriad ways characters can be created and story and plotlines can unfold, it is my opinion that the similarities are so striking as to preclude the possibility of independent creation. I believe it is far more likely that Wolff appropriated them from Freeman's work.

Respectfully submitted,

Kathryn Reiss

April 28, 2023

DocuSigned by:
Kathryn Reiss
EE281B3E1ED14B8...

EXHIBIT 1

(Curriculum Vitae – see attached)

KATHRYN REISS
Professor of English, Mills College at Northeastern University

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 Benicia, CA 94510
kathrynreissauthor@gmail.com
 707-208-4580

Education

- 1986-1988 **M.F.A.** in English and Creative Writing, **University of Michigan**, Ann Arbor, MI.
- 1980-1981 Fulbright Scholar, **Friedrichs-Wilhelms-Universität**, Bonn, Germany.
- 1977-1980 **B.A.** in English, **Duke University**, Durham, NC.
B.A. in German, **Duke University**, Durham, NC.
- 1976 Graduated from Brecksville-Broadview Heights High School, Broadview Hts., OH

Employment

- 2022-present Full Professor of English, Mills College at Northeastern University, Oakland, CA
- 2023-present Professor of English, Low Residency M.F.A. Program in Writing for Children and Young Adults, University of Nevada, Reno
- 2014-2022 Full Professor of English, Mills College, Oakland, CA
- 2017-2020 Named the Mills College Aurelia Henry Reinhardt Endowed Chair, 2017-2020
for Contributions to American Literature
- 2007-2014 Associate Professor of English, Mills College, Oakland, CA
- 2004-2007 Assistant Professor of English, Mills College, Oakland, CA
- 1989-1995, 1997-2004 Lecturer, Department of English, Mills College, Oakland, CA.
- 1986-1988 Instructor, Department of English, University of Michigan, Ann Arbor, MI.
- 1984-1986 Instructor, Department of English, Trenton State College, Trenton, NJ.
- 1983-1985 E.S.L. Instructor, Princeton Language Group and Princeton Y.W.C.A,
 Bookstore Manager, "Europa at Princeton,"
 Assistant to Children's Librarian, Princeton Public Library, Princeton, NJ.

19981-1982 Director of Foreign Exchange, Stuart Country Day School, Princeton, NJ.

Publications: 20 NOVELS of Suspense :

Time Windows, Harcourt, 1991.

The Glass House People, Harcourt, 1992.

Pale Phoenix, Harcourt, 1993.

Dreadful Sorry, Harcourt, 1994.

The Ghost in the Dollhouse (trilogy), Scholastic, 1997:

1. *Dollhouse of the Dead*

2. *The Headless Bride*

3. *Rest in Peace*

PaperQuake, Harcourt, 1998.

Riddle of the Prairie Bride, The Pleasant Company, 2001.

The Strange Case of Baby H, The Pleasant Company, 2002.

Paint By Magic, Harcourt, 2002.

Sweet Miss Honeywell's Revenge: A Ghost Story, Harcourt, 2004.

Blackthorn Winter: A Murder Mystery, Harcourt, 2006; reissued by Time Portal Press 2016

The Tangled Web: A Julie Mystery, American Girl, 2009

Puzzle of the Paper Daughter: A Julie Mystery, American Girl, 2010

The Silver Guitar: A Julie Mystery, American Girl, 2011

A Bundle of Trouble: A Rebecca Mystery, American Girl, 2011

Intruders at Rivermead Manor: A Kit Mystery, American Girl, 2014

Heatherstone Hall: A Murder Mystery, Time Portal Press, 2016

Message in a Bottle: A Julie Mystery, American Girl, 2017

5 Novels in Translation: Bahasa Indonesian, Mizan Pub., Jakarta Indonesia 2006, 2007

Time Windows

Pale Phoenix

PaperQuake

Dreadful Sorry
Paint by Magic

Film Options:

Dreadful Sorry: rights for the film option to Milena Ferreira at **625 Productions**, July 2016
(625productions.com)

Time Windows, optioned for film by LeVision Entertainment, May 2017

Sweet Miss Honeywell's Revenge, optioned for film by LeVision Entertainment, May 2017

Audiobooks:

Produced by Tantor Media, 2021. (*narrated by Raquel Beattie*)

Time Windows

Pale Phoenix

Dreadful Sorry

Produced by Recorded Books, 2008. (narrated by Suzanne Toren)

The Strange Case of Baby H

Produced by Recorded Books, 2005. (narrated by Ruth Ann Phimister)

Riddle of the Prairie Bride

Short Stories:

"Mountains," *The Archive*, Duke University Literary Journal, 1978.

"After Dark," *The Archive*, 1980.

"The Miranda Color," *The Archive*, 1980.

Magazine Articles:

"Out of the Blue," Juke Magazine, March 2023

"So, You're Trying for the Girl? (and Other Theories to Explain a Third Child)," *HipMama*, Summer 1994.

"Where Do Mystery Readers Come From?" *Mystery Week Magazine*, May 1994.

“Three Times Lucky,” *Baby Magazine* (Britain), April/May, 1996.

“If Only I’d Known” (column), *Parents* (Britain), June 1996.

6-part series on adopting older children: *Parenting The Child Who Waited*, **Adoptive Families Magazine**. (with Thomas Strychacz): 2005-2006:

Part 1 -- “In the Beginning”

Part 4 -- “School Daze”

Part 2 -- “A New Dynamic”

Part 5 -- “Balancing Act”

Part 3 -- “Settling In”

Part 6 -- “Finally—Finalization!”

Conferences and Readings (partial listing)

Panelist and Moderator at LitQuake: The Young Adult Writers of Mills College., San Francisco, CA October 2018

Benicia Literary Arts, Author Talk, On Writing Suspense Fiction; Bookshop Benicia, Benicia CA October 2018

Society of Children’s Book Writers and Illustrators, Middle Grade Fiction Master Class—featured author. Corte Madera, CA June 2018.

Gallery of Achievement Inductee, Brecksville-Broadview Heights High School, Brecksville, OH Oct 2017.

Author in the Schools, Benicia Middle School, April 2016.

Author in the Schools, Benicia Middle School, May 2015.

Benicia Literary Arts: Children’s Literature Symposium, Panelist, Benicia CA Oct 2013.

Benicia Literary Art: Featured Presenter, Workshop in Plotting the Young Adult Novel, Benicia, CA Nov 2013.

Young Writers Program/Online seminar: National Novel Writing Month, Nov 2008

LitQuake, a literary crawl –featured speaker and panelist. 2006

Lafayette Public Library, panel discussion on Writing Children’s Fiction, 2006, California Reading Association, Panel on Suspense writing, 2005.

Solano County Library Foundation, Featured Author at Fundraising Luncheon, November 2004.

Orinda Public Library, Featured Speaker on Writing Suspense Fiction, October 2004

Society of Children’s Book Writers and Illustrators, Featured Speaker for 3-Hour Seminar on Writing Novels for Children, October 2004

National Council of Teachers of English (San Francisco), featured author. November 2003.

International Reading Association, Session speaker: “Prickles at the Back of the Neck: Writing

Suspense Fiction for Children and Young Adults,” November, 2002.

Los Angeles Times Book Fair, featured author, April 2001.

American Library Association, (San Diego), panelist: “Time Travel in Children’s Books,”

May 1999.

Fresno County Author Symposium/Literacy Week: Author in the Schools and featured speaker,

“Can Creative Writing Be Taught?” March 1998.

Northern California Library Association, session speaker: “Capturing the Elusive Young Adult Reader,” Fall, 1993.

Featured or Keynote Speaker:

Society of Children’s Book Writers and Illustrators

Gallery of Achievement, Brecksville-Broadview Heights Alumni Association

American Library Association

LitQuake

Fresno County Office of Education

Northern California Society of Children’s Book Writers and Illustrators

Mystery Writers of America

Sisters in Crime

California League of University Women

Arts Benicia--Panel on Women in the Arts

Solano County Library Foundation

California Reading Association.

Awards and Distinctions:

American Field Service Scholarship to Cusco, Peru, 1975.

Fulbright-Hayes Scholarship to study German Short Fiction in Bonn, Germany, 1980-1981.

New Jersey State Council on the Arts, Grant for Fiction Writing, 1982.

The Hopwood Award for Short Fiction, University of Michigan, Ann Arbor, MI, 1988.

American Library Association, “Best Book for Young Adults” Award for *Time Windows*, 1992.

State of Maryland’s “Black Eyed Susan” Award for *Time Windows*, 1992.

The Junior Library Guild, featured selection: *Dreadful Sorry*, 1993.

The School Library Journal, starred review for *Dreadful Sorry*, 1993.

Nominee for Best YA Mystery, (The Edgar Ellan Poe Award, Mystery Writers of America), for *Pale Phoenix*, 1995

Nominee for Best YA Mystery, (The Edgar Ellan Poe Award, Mystery Writers of America), for *PaperQuake*, 1999.

South Carolina Public Libraries, 'Best Books List' for *PaperQuake*, 2002.

VOYA (Voice of Youth Advocates), "Top Shelf Fiction for Middle School Readers" for *Paint By Magic*, 2003.

International School Librarians' Association, Honor Book for *Paint By Magic*, 2003.

Recorded Books, featured audio recording: *The Strange Case of Baby H*, 2003.

YALSA, Best Paper Back Mystery List, for *PaperQuake*, 2004.

YALSA Teens' Top Ten list, for *Blackthorn Winter*, 2006

Featured in *Young Adult Literature in the 21st Century*, a textbook by Pam B. Cole, McGraw-Hill Higher Education, 2009, pp-298-300, 322, 324.

Featured in *The Atlantic*, 2013: *The 8 Habits of Highly Successful Young Adult Fiction Authors*

Named the Mills College Aurelia Henry Reinhardt Endowed Chair, 2017-2020 for *Contributions to American Literature*

Courses Taught at Mills College (1989-present):

Critical Reading and Expository Writing (English Composition)

Remedial Composition

Intermediate Composition

English as a Second Language

Literature and Time

Creative Writing Workshops (Beginning and Intermediate Fiction)

Writing Fiction for Children and Young Adults (Beginning, Advanced and Graduate)

The Craft of the YA Novel (craft, literature and history)

Writing the Genre Novel (grad/undergrad workshop with special focus on genre novels)

Independent Study/Directing M.F.A. Theses / Reading M.F.A. Theses

First Year Writing (Critical and Essay Writing for First Year Students)

On Social Media:

- **Facebook:** <https://www.facebook.com/KathrynReissAuthor>
- **Instagram:** <https://www.instagram.com/kathrynreissauthor/>
- **Twitter:** <https://twitter.com/kathrynReiss>

Author Bio



KATHRYN REISS wrote her first novel, *Time Windows*, after college while she lived in Germany as a Fulbright Scholar and had nothing left to read in English. Now she is the award-winning author of 20 novels of suspense for middle grade and young adult readers, published by Harcourt, Scholastic, American Girl, and Rosen Windmill. Five of her books are audiobooks with Tantor Media and Recorded Books. Three have been optioned for film. Her short articles and essays have appeared in both print and online magazines such as *Adoptive Families*, *Parents*, and *JUKE*.

Time Windows was selected by the American Library Association as a "Best Book for Young Adults," received YALSA's "Popular Paperback for Young Adults" award and the State of Maryland's "Blackeyed Susan Young Reader Medal." *Dreadful Sorry*, also a YALSA Popular Paperback for Young Adults, was a featured selection of the Junior Library Guild and was named "Pick of the Crop" in *The School Library Journal* starred review. *Pale Phoenix* and *PaperQuake* were nominated for the Mystery Writers of America's "Edgar Allan Poe" award, and *PaperQuake* additionally was named one of YALSA's 'Popular Paperbacks for Young Adults.' *Paint By Magic* won a place on VOYA's 'Top Shelf Fiction for Middle School Readers' and

is an International School Librarians Association honor book.

Reiss has been a Writer in Residence for the Princeton Arts Council, a recipient of the New Jersey State Council on the Arts Grant for Writers, and has been a featured speaker with (among others) Sisters in Crime, Mystery Writers of America, The Society of Children's Book Writers and Illustrators, The Northern California Library Association, The International Reading Association, Fresno County Office of Education, California Reading Association, The American Library Association, and the National Council of Teachers of English. She was featured in *The Atlantic* as one of several 'highly successful young adult fiction authors and garnered a several-page spread in *Young Adult Literature in the 21st Century*, a college textbook by Pam B. Cole.

Reiss earned her undergraduate degrees in English and German at Duke University and her graduate degree at the University of Michigan, Ann Arbor. She is a Full Professor of English at Mills College at Northeastern University, and also teaches in the low residency M.F.A. program at the University of Nevada, Reno. She lives in a rambling historic house in Northern California with two rescue dogs, two rescue cats, her husband (and best friend) and the last of their seven children still in the nest.



EXHIBIT 2**(Materials Considered)**

- 1) First Amended Complaint and Exhibits 1 , 2 and 3 thereto.
- 2) Blue Moon Dec 2010 PDF.pdf
- 3) BMR 2011 Copyright Version – (1).pdf
- 4) Masqued 2012.PDF.pdf
- 5) Masqued 2013.pdf
- 6) 16.pdf
- 7) Masqued 2014.PDF.pdf
- 8) Chapter Analysis 5-14-2010.pdf
- 9) The world.doc
- 10) The plot.pdf
- 11) Midnight Overview 11-08-2009.pdf
- 12) The Cast 11-21-2008.pdf
- 13) Chapter Outline Masqued 2013 PDF.pdf
- 14) Pitch Notes to Emily 2013.pdf
- 15) Chapter Outline Masqued 2013 PDF.pdf
- 16) 2010 The World Notes.pdf
- 17) Midnight Overview 11-09-2009.pdf
- 18) The Cast 11-21-2008.pdf
- 19) Marcheline and Brie.pdf
- 20) The Plot.pdf.
- 21) Chapter 4 “Fictional literary & Dramatic Works” from Substantial Similarity in Copyright Law by Robert and Eric Osterberg, pp. 4-1 – 4-13.
- 22) The Key.pdf
- 23) Crave, by Tracy Wolff
- 24) Crush, by Tracy Wolff
- 25) Covet, by Tracy Wolff
- 26) Court, by Tracy Wolff